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No. 82-65

IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 1982

MARGARET R. BROWN, JUDY KNIGHT, JANE MAXWELL, MARY SHENEFIELD, MIRIAM S. STRAUGHAN, SANDRA H. SHUPTRINE, OLIVE J. WHITE,

Appellants,

v.

THYRA THOMSON, as Secretary of the State of Wyoming, ED HERSCHLER, THYRA THOMSON, SHIRLEY WITTLER and JAMES B. GRIFFITH, as members of the State Canvassing Board, and ED HERSCHLER, as Governor of the State of Wyoming,

Appellees.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT, FOR THE DISTRICT OF WYOMING

JOINT APPENDIX EXHIBITS

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APPEAL DOCKETED JULY 13, 1982
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DEFINITIONS OF STATISTICAL TERMS AND CONCEPTS FREQUENTLY APPLIED BY COURTS REVIEWING APPORTIONMENTS

IDEAL DISTRICT POPULATION (ideal population per representative seat)	Total State Population divided by Total number of representative seats.

INDIVIDUAL DISTRICTS

PERSONS REPRESENTED (Actual District Population per representative)	District Population divided by Number of representative seats for that County or District
DEVIATION	Statistical Measure of Difference between "Persons Represented" from a particular district and the Ideal District Population, expressed as a numerical difference (ABSOLUTE) or as a ratio or percentage (RELATIVE).
ABSOLUTE DEVIATION	Ideal District Population less the Actual District Population A negative value, indicating fewer persons-per-representative than the Ideal, indicates over-representation of the people in that District. A positive value, conversely indicates under-representation.
RELATIVE DEVIATION	Actual District Population divided by Ideal District Population The resulting value is a ratio of the persons represented (actual district population) to the ideal population per representative. If the ratio is multiplied by 100, the resulting value is a percentage. If the ratio exceeds 1.00, and the

percentage thereby exceeds 100% of ideal, this indicates under-representation; that is, the district population per representative is greater than the population-per-representative in the "Ideal District". A ratio of less than 1.00 indicates over-representation.

RANGE AND RATIO COMPARISONS

The overall range between the **most over-represented district** (with the greatest negative value in the absolute deviation column and the lowest ratio in the relative deviation column) and the **most under-represented district** (with the greatest positive absolute deviation and largest relative deviation ratio). This measure may be termed OVERALL ABSOLUTE RANGE or OVERALL RELATIVE RANGE, depending on which factors are used.

OVERALL ABSOLUTE RANGE

The simplest method of calculating OVERALL ABSOLUTE RANGE is to sum the value of the largest positive absolute deviation value and the largest negative absolute deviation value (without regard to whether they are positive or negative in the addition process). In other words, the absolute value of these figures is summed.

OVERALL RELATIVE RANGE

The simplest method for calculating OVERALL RELATIVE RANGE is to subtract the smallest value (always less than 1.00) from the largest value (always greater than 1.00); the difference is the OVERALL RELATIVE RANGE.

RATIO (of the largest population-per-representative to the smallest population-per-representative.)	Largest population-per-representative divided by the smallest population-per-representative. The largest population-per-representative value shows the most under-represented district; the smallest population-per-representative figure represents the most over-represented districts.

AVERAGE (MEAN) DEVIATION

Sum of all deviations divided by number of entries.

ABSOLUTE MEAN DEVIATION	Sum of all absolute deviation values (without reference to " + " and " – " signs) divided by number of districts.
RELATIVE MEAN DEVIATION	Sum of all relative deviation (measured as distance from ideal) divided by number of districts.

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MINIMUM PERCENTAGE OF POPULATION ELECTING A MAJORITY OF SEATS (HOUSE OR SENATE) Measure of dominance of a legislative body gained by over-represented districts. Generally, a hypothetical worst-case selection of over-represented counties is used to provide an estimate of the maximum theoretical vote dilution.	The smallest percentage of the population, from generally over-represented counties and counties nearly ideal, taken together, which can elect a bare majority of seats in a legislative body.

1963
WYOMING SENATE APPORTIONMENT

COUNTY	1960 POPULATION	NO. OF SEN.	PERSONS REPRESENTED	DEVIATION ABSOLUTE-RELATIVE
Albany	21,290	1	21,290	-8104 or 1.61
Big Horn	11,898	1	11,898	1288 0.90
Campbell	5,861	1	5,861	7325 0.44
Carbon	14,937	1	14,937	-1751 1.13
Converse	6,366	1	6,366	6820 0.48
Crook	4,691	1	4,691	8495 0.36
Fremont	26,168	1	26,168	-12982 1.98
Goshen	11,941	1	11,941	1245 0.91
Hot Springs	6,365	1	6,365	6821 0.48
Johnson	5,475	1	5,475	7711 0.42
Laramie	60,149	2	30,075	-16889 2.28
Lincoln	9,018	1	9,018	4168 0.68
Natrona	48,623	2	24,811	-11625 1.88
Niobrara	3,570	1	3,570	9436 0.28
Park	16,874	1	16,874	-3688 1.28
Platte	7,195	1	7,195	5991 0.55
Sheridan	18,989	1	18,989	-5803 1.44
Sublette	3,778	1	3,778	9408 0.29
Sweetwater	17,920	1	17,920	-4734 1.36
Teton	3,062	1	3,062	10124 0.23
Uinta	7,484	1	7,484	5702 0.57
Washakie	8,883	1	8,883	4303 0.67
Weston	7,929	1	7,929	5257 0.60
Totals	329,646	25		

As apportioned by the Wyoming Legislature, Session Laws 1963, Ch. 22. (Later invalidated by the U.S. District Court, Wyoming, *Schaefer v. Thomson*, 240 F. Supp. 247 (1964)).

Population figures are from the U.S. Census of Population for 1960.

Ideal Representation is one Senator per 13,186 residents. A Relative Deviation Value of less than 1.00 indicates over-representation; a value of more than 1.00 indicates under-representation.

Range, Ratio and Average Deviation

1963 Wyoming Senate Apportionment

OVERALL RANGE—ABSOLUTE: ..... (sum of absolute deviation values of most over-represented county, Teton, and most under-represented county, Laramie, ignoring "+" and "–" signs)	27,013
OVERALL RANGE—RELATIVE: ..... (sum of relative deviation values of most over-represented county, Teton, and most under-represented county, Laramie, ignoring "+" and "–" signs)	2.05
RATIO: ..... (ratio of largest population-per-seat from the most under-represented county to the smallest population-per-seat from the most over-represented county)	9.82
ABSOLUTE MEAN (AVERAGE) DEVIATION:	6942
RELATIVE MEAN (AVERAGE) DEVIATION:	0.53

1965

WYOMING SENATE APPORTIONMENT

DISTRICT	1960 POPULATION	NO. OF SEN.	PERSONS REPRESENTED	DEVIATION ABSOLUTE-RELATIVE
Albany	21,290	2	10,645	343 or 0.97
Big Horn	11,898	1	11,898	-910 1.08
Campbell-Johnson	11,336	1	11,336	-348 1.03
Carbon	14,937	1	14,937	-3949 1.36
Converse-Niobrara	10,116	1	10,116	872 0.92
Crook-Weston	12,620	1	12,620	-1632 1.15
Fremont-Hot Springs	32,533	3	10,844	144 0.99
Goshen	11,941	1	11,941	-953 1.09
Laramie	60,149	5	12,030	-1042 1.09
Natrona	49,623	4	12,406	-1418 1.13
Park	16,874	2	8,437	2551 0.77
Platte	7,195	1	7,195	3793 0.65
Sheridan	18,939	2	9,469	1519 0.86
Sublette-Teton No. Lincoln	11,245	1	11,245	-257 1.02
Sweetwater	17,920	2	8,960	2028 0.82
Uinta-So. Lincoln	12,097	1	12,097	-1109 1.10
Washakie	8,883	1	8,883	2105 0.81
Totals	329,646	30		

As apportioned by the U.S. District Court in *Schaefer v. Thomson*, 251 F. Supp. 450 (1965).

Population figures are from the U.S. Census of Population for 1960.

Ideal Representation is one Senator per 10,988 residents. A Relative Deviation Value of less than 1.00 indicates over-representation; a value of more than 1.00 indicates under-representation.

Range, Ratio and Average Deviation

1965 Wyoming Senate Apportionment
(by the Court)

OVERALL RANGE—ABSOLUTE: (sum of absolute deviation values of most over-represented county, Platte, and most under-represented county, Laramie, ignoring " + " and " – " signs)	7,742
OVERALL RANGE—RELATIVE: (sum of relative deviation values of most over-represented county, Platte, and most under-represented county, Laramie, ignoring " + " and " – " signs)	0.71
RATIO: (ratio of largest population-per-seat from the most under-represented county to the smallest population-per-seat from the most over-represented county)	2.08
ABSOLUTE MEAN (AVERAGE) DEVIATION:	1469
RELATIVE MEAN (AVERAGE) DEVIATION:	0.13

1971
WYOMING SENATE APPORTIONMENT

DISTRICT	1970 POPULATION	NO. OF SEN.	VOTERS: RATIO	DEVIATION ABSOLUTE-RELATIVE
Albany	26,431	2	13,215	-2135 or 1.19
Big Horn	10,202	1	10,202	878 0.92
Campbell-Johnson	18,544	2	9,272	1808 0.84
Carbon	13,354	1	13,354	-2274 1.21
Converse-Niobrara	8,862	1	8,862	2218 0.80
Crook-Weston	10,842	1	10,842	238 0.98
Fremont	28,352	2	28,352	-3096 1.28
Goshen-Platte	17,371	2	8,686	2394 0.78
Hot Springs-Washakie	12,521	1	12,521	-1441 1.13
Laramie	56,360	5	11,272	-192 1.02
Uinta-So. Lincoln	11,465	1	11,465	-385 1.03
Natrona	51,264	4	12,816	-1736 1.16
Park	17,752	2	8,876	2204 0.80
Sheridan	17,852	2	8,926	2154 0.81
Sublette-Teton No. Lincoln	12,853	1	12,853	-1773 1.16
Sweetwater	18,391	2	9,196	1884 0.83
Totals	332,416	30		

As apportioned by the Wyoming Legislature, Session Laws 1971, Ch. 161. (Approved by the U.S. District Court, Wyoming, in *Thompson v. Thomson*, 344 F. Supp. 1378 (1972)).

Population figures are from the U.S. Census of Population for 1970.

Ideal Representation is one Senator per 11,080 residents. A Relative Deviation Value of less than 1.00 indicates over-representation; a value of more than 1.00 indicates under-representation.

Range, Ratio and Average Deviation

1971 Wyoming Senate Apportionment

OVERALL RANGE—ABSOLUTE: ..... (sum of absolute deviation values of most over-represented county, Goshen-Platte, and most under-represented county, Fremont, ignoring "+" and "–" signs)	5490
OVERALL RANGE—RELATIVE: ..... (sum of relative deviation values of most over-represented county, Goshen-Platte, and most under-represented county, Fremont, ignoring "+" and "–" signs)	0.50
RATIO: ..... (ratio of largest population-per-seat from the most under-represented county to the smallest population-per-seat from the most over-represented county)	1.63
ABSOLUTE MEAN (AVERAGE) DEVIATION:	1676
RELATIVE MEAN (AVERAGE) DEVIATION:	0.15

1981
WYOMING SENATE APPORTIONMENT

COUNTY	POPULATION	NO. OF SEN.	PERSONS REPRESENTED	DEVIATION ABSOLUTE-RELATIVE
Albany	29,062	2	14,531	1121 or 0.93
Big Horn	11,896	1	11,896	3756 0.76
Campbell-Johnson	31,067	2	15,534	118 0.99
Carbon	21,896	1	21,896	-6244 1.40
Converse	14,069	1	14,069	1583 0.90
Crook-Weston	12,414	1	12,414	3238 0.79
Fremont	38,992	2	19,496	-3844 1.25
Goshen-Niobrara	14,964	1	14,964	688 0.96
Hot Springs-Washakie	15,206	1	15,206	446 0.97
Laramie	68,649	4	17,162	-1510 1.10
Lincoln	12,177	1	12,177	3475 0.78
Natrona	71,856	4	17,964	-2312 1.15
Park	21,639	1	21,639	-5987 1.38
Platte	11,975	1	11,975	3677 0.77
Sheridan	25,048	2	12,524	3128 0.80
Sublette-Teton	13,903	1	13,903	1749 0.89
Sweetwater	41,723	3	13,908	1744 0.89
Uinta	13,021	1	13,021	2631 .83
Total	469,557	30		

As apportioned by the Wyoming Legislature, Session Laws 1981, Ch. 76, Section 1.

Population figures are from the U.S. Census of Population of 1980.

Ideal Representation is one Senator per 15,652 residents. A Relative Deviation Value of less than 1.00 indicates over-representation; a value of more than 1.00 indicates under-representation.

Range between most over-represented county and most under-represented county:

Absolute = 10,000
Relative = 0.64

Absolute Mean Average Deviation = 2625
Relative Mean Average Deviation = 0.17

Range, Ratio and Average Deviation

1981 Wyoming Senate Apportionment

OVERALL RANGE—ABSOLUTE: ..... (sum of absolute deviation values of most over-represented county, Big Horn, and most under-represented county, Carbon, ignoring "+" and "–" signs)	10,000
OVERALL RANGE—RELATIVE: ..... (sum of relative deviation values of most over-represented county, Big Horn, and most under-represented county, Carbon, ignoring "+" and "–" signs)	0.64
RATIO: ..... (ratio of largest population-per-seat from the most under-represented county to the smallest population-per-seat from the most over-represented county)	1.84
ABSOLUTE MEAN (AVERAGE) DEVIATION:	2625
RELATIVE MEAN (AVERAGE) DEVIATION:	0.17

1963

WYOMING HOUSE OF REPRESENTATIVES*

POPULATION OF STATE - 329,646

NUMBER OF REPRESENTATIVES - 61

IDEAL REPRESENTATION - 5,404

OFFICIAL DIVISOR - 5,400

COUNTY	POPULATION	NO. OF REP's	PERSONS REPRESENTED	DEVIATION ABSOLUTE-RELATIVE
Albany	21,290	4	5,323	81 or 0.99
Big Horn	11,898	2	5,949	-545 1.10
Campbell	5,861	1	5,861	-487 1.08
Carbon	14,937	3	4,979	425 0.92
Converse	6,366	1	6,366	-962 1.18
Crook	4,691	1	4,691	713 0.87
Fremont	26,168	5	5,234	170 0.97
Goshen	11,941	2	5,971	-567 1.10
Hot Springs	6,365	1	6,365	-961 1.18
Johnson	5,475	1	5,475	-71 1.01
Laramie	60,149	11	5,468	-64 1.01
Lincoln	9,018	2	4,509	895 0.83
Natrona	49,623	9	5,514	-110 1.02
Niobrara	3,750	1	3,750	1654 0.69
Park	16,874	3	5,625	-221 1.04
Platte	7,195	1	7,195	-1791 1.33
Sheridan	18,989	4	4,747	657 0.88
Sublette	3,778	1	3,778	1626 0.70
Sweetwater	17,920	3	5,973	-569 1.11
Teton	3,062	1	3,062	2342 0.57
Uinta	7,484	1	7,484	-2080 1.38
Washakie	8,883	2	4,442	962 0.82
Weston	7,929	1	7,929	-2525 1.47
Totals	329,646	61		

Population figures are official U.S. Census Bureau decennial figures for Wyoming.

"Persons Represented" is calculated by dividing the county population by its number of representatives in the Wyoming House. This figure is the Actual County Representation.

Absolute Deviation is difference between Ideal Representation and Actual County Representation. A positive deviation value indicates over-representation.

Relative Deviation is calculated by dividing the Actual County Representation by the Ideal Representation. A value of less than 1.00 indicates over-representation. A value of more than 1.00 indicates under-representation.

*Wyoming Session Laws 1963, Ch. 22, § 3.

Range, Ratio and Average Deviation

1963 Wyoming House Apportionment

OVERALL RANGE—ABSOLUTE: ..... (sum of absolute deviation values of most over-represented county, Teton, and most under-represented county, Weston, ignoring " + " and " – " signs)	4867
OVERALL RANGE—RELATIVE: ..... (sum of relative deviation values of most over-represented county, Teton, and most under-represented county, Weston, ignoring " + " and " – " signs)	0.90
RATIO: ..... (ratio of largest population-per-seat from the most under-represented county to the smallest population-per-seat from the most over-represented county)	2.59
ABSOLUTE MEAN (AVERAGE) DEVIATION:	889
RELATIVE MEAN (AVERAGE) DEVIATION:	0.16

1971

WYOMING HOUSE OF REPRESENTATIVES*

POPULATION OF STATE - 332,416

NUMBER OF REPRESENTATIVES - 62

IDEAL REPRESENTATION - 5,362

OFFICIAL DIVISOR - 5,300

COUNTY	POPULATION	NO. OF REP's	PERSONS REPRESENTED	DEVIATION ABSOLUTE-RELATIVE
Albany	26,431	5	5,286	76 or 0.99
Big Horn	10,202	2	5,101	261 0.95
Campbell	12,597	2	6,299	-937 1.17
Carbon	13,354	3	4,451	911 0.83
Converse	5,938	1	5,938	-576 1.11
Crook	4,535	1	4,535	827 0.85
Fremont	28,352	5	5,670	-308 1.06
Goshen	10,885	2	5,443	-81 1.02
Hot Springs	4,952	1	4,952	410 0.92
Johnson	5,587	1	5,587	-225 1.04
Laramie	56,360	11	5,124	238 0.96
Lincoln	8,640	2	4,320	1042 0.81
Natrona	51,264	10	5,126	236 0.96
Niobrara	2,924	1	2,924	2438 0.55
Park	17,752	3	5,917	-555 1.10
Platte	6,486	1	6,486	-1124 1.21
Sheridan	17,852	3	5,951	-589 1.11
Sublette	3,755	1	3,755	1607 0.70
Sweetwater	18,391	3	6,130	-768 1.14
Teton	4,823	1	4,823	539 0.90
Uinta	7,100	1	7,100	-1738 1.32
Washakie	7,569	1	7,569	-2207 1.41
Weston	6,307	1	6,307	-945 1.18
Totals	332,416	62		

Population figures are official U.S. Census Bureau decennial figures for Wyoming.

"Persons Represented" is calculated by dividing the county population by its number of representatives in the Wyoming House. This figure is the Actual County Representation.

Absolute Deviation is difference between Ideal Representation and Actual County Representation. A positive deviation value indicates over-representation.

Relative Deviation is calculated by dividing the Actual County Representation by the Ideal Representation. A value of less than 1.00 indicates over-representation. A value of more than 1.00 indicates under-representation.

*Wyoming Session Laws 1971, Ch. 161, §§ 3, 5.

Range, Ratio and Average Deviation

1971 Wyoming House Apportionment

OVERALL RANGE—ABSOLUTE: (sum of absolute deviation values of most over-represented county, Niobrara, and most under-represented county, Washakie, ignoring "+" and "–" signs)	4645
OVERALL RANGE—RELATIVE: (sum of relative deviation values of most over-represented county, Niobrara, and most under-represented county, Washakie, ignoring "+" and "–" signs)	0.86
RATIO: (ratio of largest population-per-seat from the most under-represented county to the smallest population-per-seat from the most over-represented county)	2.59
ABSOLUTE MEAN (AVERAGE) DEVIATION:	810
RELATIVE MEAN (AVERAGE) DEVIATION:	0.15

1981

WYOMING HOUSE OF REPRESENTATIVES*

POPULATION OF STATE - 469,557

NUMBER OF REPRESENTATIVES - 64

IDEAL REPRESENTATION - 7,337

COUNTY	POPULATION	NO. OF REP's	PERSONS REPRESENTED	DEVIATION ABSOLUTE	RELATIVE
Albany	29,062	4	7,266	71 or	0.99
Big Horn	11,896	2	5,948	1389	0.81
Campbell	24,367	3	8,122	-785	1.11
Carbon	21,896	3	7,299	38	0.99
Converse	14,069	2	7,035	302	0.96
Crook	5,308	1	5,308	2029	0.72
Fremont	38,992	5	7,798	-461	1.06
Goshen	12,040	2	6,020	1317	0.82
Hot Springs	5,710	1	5,710	1627	0.78
Johnson	6,700	1	6,700	637	0.91
Laramie	68,649	9	7,628	-291	1.04
Lincoln	12,177	2	6,089	1248	0.83
Natrona	71,856	9	7,984	-647	1.09
Niobrara	2,924	1	2,924	4413	0.40
Park	21,639	3	7,213	124	0.98
Platte	11,975	2	5,988	1349	0.82
Sheridan	25,048	3	8,349	-1012	1.14
Sublette	4,548	1	4,548	2789	0.62
Sweetwater	41,723	5	8,345	-1008	1.14
Teton	9,355	1	9,355	-2018	1.28
Uinta	13,021	2	6,511	826	0.89
Washakie	9,496	1	9,496	-2159	1.29
Weston	7,106	1	7,106	231	0.97
Totals	469,557	64			

Population figures are official U.S. Census Bureau decennial figures for Wyoming.

"Persons Represented" is calculated by dividing the county population by its number of representatives in the Wyoming House. This figure is the Actual County Representation.

Absolute Deviation is difference between Ideal Representation and Actual County Representation. A positive deviation value indicates over-representation.

Relative Deviation is calculated by dividing the Actual County Representation by the Ideal Representation. A value of less than 1.00 indicates over-representation. A value of more than 1.00 indicates under-representation.

*Wyoming Session Laws 1981, Ch. 76, §§1, 3.

Range, Ratio and Average Deviation

1963 Wyoming Senate Apportionment

OVERALL RANGE—ABSOLUTE: ..... (sum of absolute deviation values of most over-represented county, Niobrara, and most under-represented county, Washakie, ignoring " + " and " – " signs)	6572
OVERALL RANGE—RELATIVE: ..... (sum of relative deviation values of most over-represented county, Niobrara, and most under-represented county, Washakie, ignoring " + " and " – " signs)	0.89
RATIO: ..... (ratio of largest population-per-seat from the most under-represented county to the smallest population-per-seat from the most over-represented county)	3.25
ABSOLUTE MEAN (AVERAGE) DEVIATION:	1164
RELATIVE MEAN (AVERAGE) DEVIATION:	0.16

1981

WYOMING HOUSE OF REPRESENTATIVES***

POPULATION OF STATE - 469,557

NUMBER OF REPRESENTATIVES - 63

IDEAL REPRESENTATION - 7,453

COUNTY	POPULATION	NO. OF REP's	PERSONS REPRESENTED	DEVIATION ABSOLUTE	RELATIVE
Albany	29,062	4	7,266	187 or	0.97
Big Horn	11,896	2	5,949	1504	0.80
Campbell	24,367	3	8,122	-669	1.09
Carbon	21,896	3	7,299	154	0.98
Converse	14,069	2	7,035	418	0.94
Crook	5,308	1	5,308	2145	0.71
Fremont	38,992	5	7,798	-345	1.05
Goshen-Niobrara	14,964	2	7,482	-29	1.00
Hot Springs	5,710	1	5,710	1743	0.77
Johnson	6,700	1	6,700	753	0.90
Laramie	68,649	9	7,628	-175	1.02
Lincoln	12,177	2	6,089	1364	0.82
Natrona	71,856	9	7,984	-531	1.07
Park	21,639	3	7,213	240	0.97
Platte	11,975	2	5,988	1465	0.80
Sheridan	25,048	3	8,349	-896	1.12
Sublette	4,548	1	4,548	2905	0.61
Sweetwater	41,723	5	8,345	-892	1.12
Teton	9,355	1	9,355	-1902	1.26
Uinta	13,021	2	6,511	942	0.87
Washakie	9,496	1	9,495	-2043	1.27
Weston	7,106	1	7,106	347	0.95
Totals	469,557	63			

Population figures are official U.S. Census Bureau decennial figures for Wyoming.

"Persons Represented" is calculated by dividing the county population by its number of representatives in the Wyoming House. This figure is the Actual County Representation.

Absolute Deviation is difference between Ideal Representation and Actual County Representation. A positive deviation value indicates over-representation.

Relative Deviation is calculated by dividing the Actual County Representation by the Ideal Representation. A value of less than 1.00 indicates over-representation. A value of more than 1.00 indicates under-representation.

***Apportionment as proposed by plaintiffs, joining Niobrara and Goshen Counties into one Representative District and thereby reducing the total number of Representatives to 63.

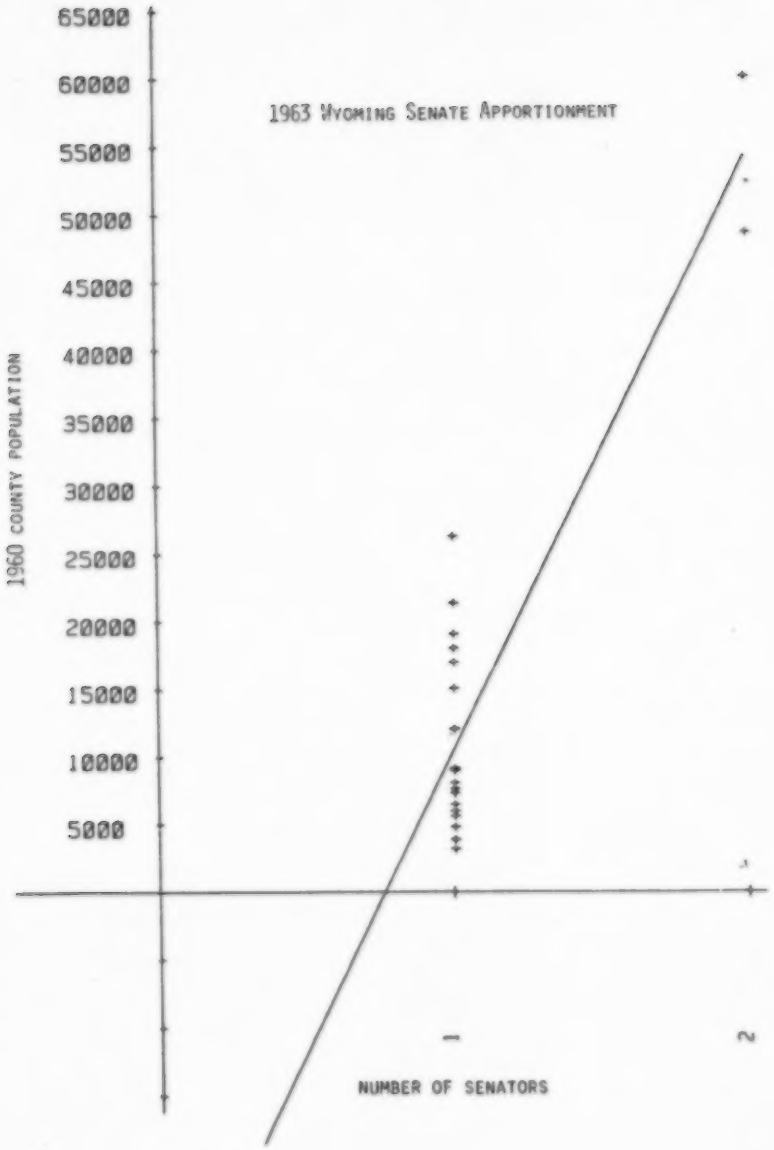
Range, Ratio and Average Deviation

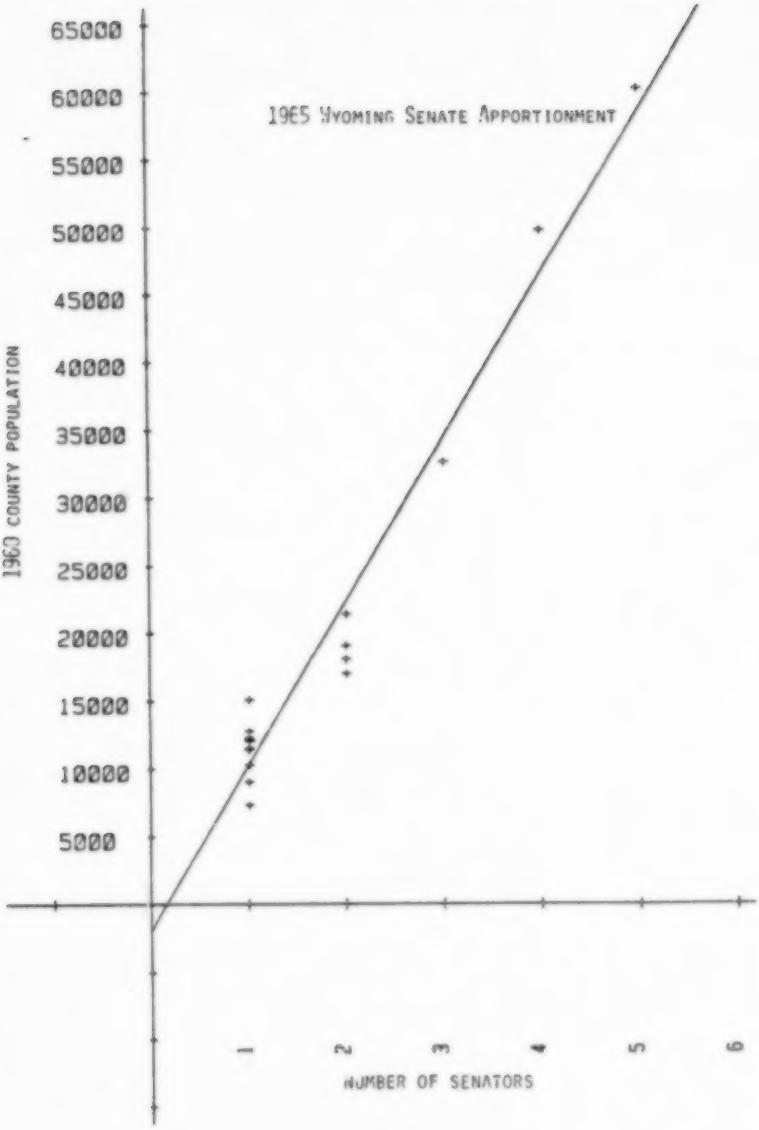
1981 Wyoming House
(Proposed 63-seat reapportionment)

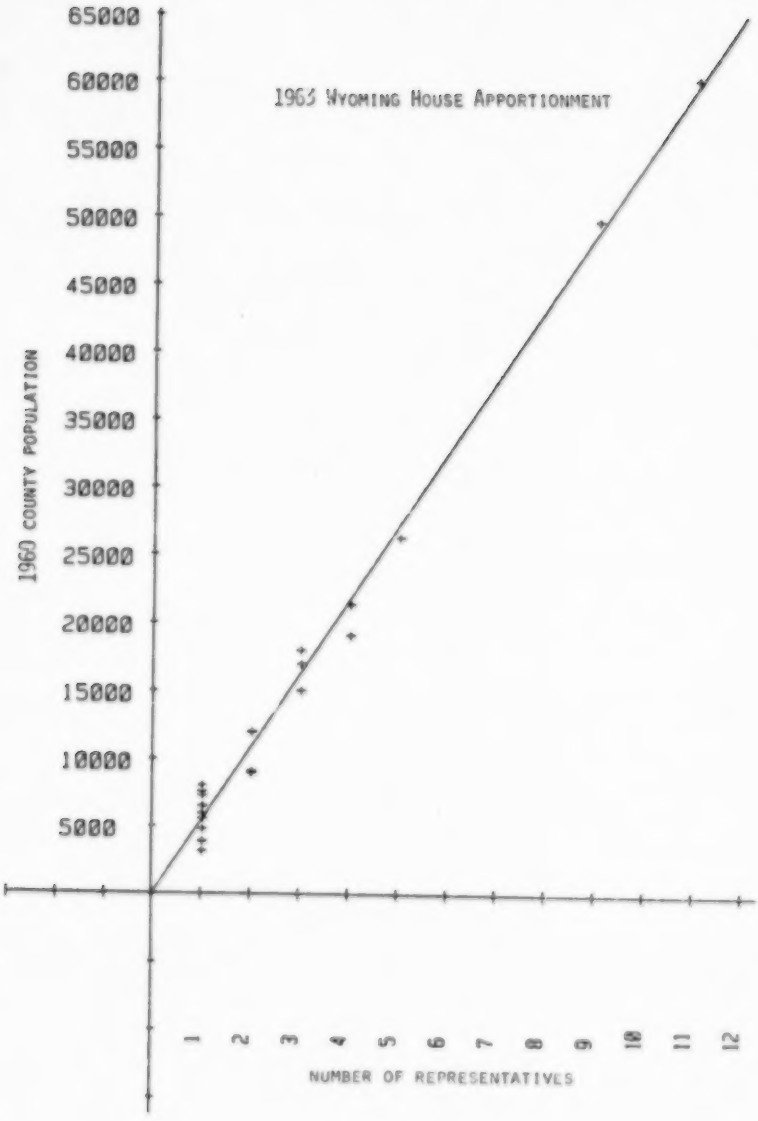
OVERALL RANGE—ABSOLUTE: ..... (sum of absolute deviation values of most over-represented county, Sublette, and most under-represented county, Washakie, ignoring "+" and "–" signs)	4948
OVERALL RANGE—RELATIVE: ..... (sum of relative deviation values of most over-represented county, Sublette, and most under-represented county, Washakie, ignoring "+" and "–" signs)	0.66
RATIO: ..... (ratio of largest population-per-seat from the most under-represented county to the smallest population-per-seat from the most over-represented county)	2.09
ABSOLUTE MEAN (AVERAGE) DEVIATION:	984
RELATIVE MEAN (AVERAGE) DEVIATION:	0.13

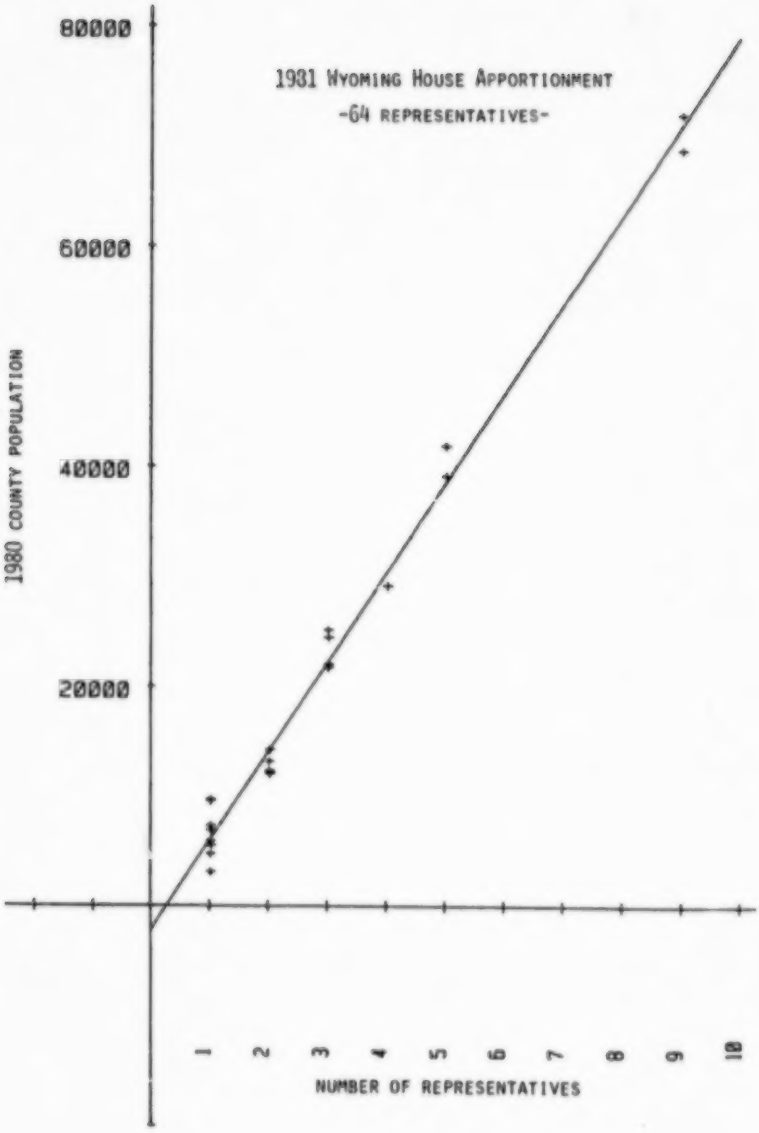
COMPARISONS

APPORTIONMENT	RANGE ABSOLUTE	RANGE RELATIVE	RATIO	MEAN (average) DEVIATION ABSOLUTE	MEAN (average) DEVIATION RELATIVE
1963 Senate	27,013	2.05	9.82	6,942	0.53
1965 Senate	7,742	0.71	2.08	1,469	0.13
1971 Senate	5,490	0.50	1.63	1,676	0.15
1981 Senate	10,000	0.64	1.84	2,625	0.17
1963 House	4,867	0.90	2.59	889	0.16
1971 House	4,645	0.86	2.59	810	0.15
1981 House	6,562	0.89	3.25	1,164	0.16
1981 House (modified by combining Goshen and Niobrara Counties; 63 seats)	4,948	0.66	2.09	984	0.13


1963 Wyoming Senate Apportionment
1960 County Population
65000
60000
55000
50000
45000
40000
35000
30000
25000
20000
15000
10000
5000
1
2
Number of Senators


1965 Wyoming Senate Apportionment
1960 County Population
65000
60000
55000
50000
45000
40000
35000
30000
25000
20000
15000
10000
5000
1
2
3
4
5
6
Number of Senators


1963 WYOMING HOUSE APPORTIONMENT
1960 COUNTY POPULATION
65000
60000
55000
50000
45000
40000
35000
30000
25000
20000
15000
10000
5000
1
2
3
4
5
6
7
8
9
10
11
12
NUMBER OF REPRESENTATIVES


1981 Wyoming House Apportionment
-64 representatives-
80000
60000
40000
20000
1980 county population
1
2
3
4
5
6
7
8
9
10
number of representatives

1963 APPORTIONMENT WYOMING SENATE
POPULATION OF STATE - 329,646

- - - - - - - - - -

MINIMUM POPULATION ELECTING A MAJORITY OF SENATORS

- - - - - - - - - -

NUMBER OF SENATORS - 25
MAJORITY OF SENATORS -13

"WORST-CASE" SCENARIO*

COUNTY	POPULATION	NO. OF SENATORS
Campbell	5,861	1
Converse	6,366	1
Crook	4,691	1
Hot Springs	6,365	1
Johnson	5,475	1
Lincoln	9,018	1
Niobrara	3,750	1
Platte	7,195	1
Sublette	3,778	1
Teton	3,062	1
Uinta	7,484	1
Washakie	8,883	1
Weston	7,929	1
Totals:	79,857	13

Total population of listed counties, divided by total population of the state, yields the percentage of population represented by a majority of Senators.

79,857 ÷ 329,646 = 24.23% of population
13 ÷ 25 = 52.00% of Senators.

* The "worst-case" scenario is developed by selecting counties that are over-represented (or near to ideally represented) with a sufficient number of senators to yield a majority in the Senate. Fifteen (15) over-represented counties, including all shown above and Big Horn County (deviation value of 0.90) and Goshen County (deviation value of 0.91), would have elected 15 Senators. Goshen and Big Horn were deleted to bring the number of Senators elected down to 13, a bare majority. These two counties were the least over-represented of the 15 counties.

CONCLUSION: 24.23% of the population would have elected 52.00% of the Senators under this apportionment. (Laws 1963, Ch. 22). (Invalidated in *Schaefer v. Thomson*, 240 F. Supp. 247, D. Wyo. 1964.)

1965 APPORTIONMENT WYOMING SENATE
POPULATION OF STATE - 329,646

. . . . . .

MINIMUM POPULATION ELECTING A MAJORITY OF SENATORS

. . . . . .

NUMBER OF SENATORS - 30
MAJORITY OF SENATORS -16

"WORST-CASE" SCENARIO*

COUNTY	POPULATION	NO. OF SENATORS
Albany	21,290	2
Campbell-Johnson	11,366	1
Converse-Niobrara	10,116	1
Fremont-Hot Springs	32,533	3
Park	16,874	2
Platte	7,195	1
Sheridan	18,939	2
Sublette-Teton-No. Lincoln	11,245	1
Sweetwater	17,920	2
Washakie	8,883	1
Totals:	156,331	16

Total population of listed counties, divided by total population of the state, yields the percentage of population represented by a majority of Senators.

156,331 ÷ 329,646 = 47.42% of population
16 ÷ 30 = 53.33% of Senators.

* The "worst-case" scenario is developed by selecting counties that are over-represented (or near to ideally represented) with a sufficient number of senators to yield a majority in the Senate. Eight counties (or multi-county districts) were over-represented, electing 14 Senators. Two districts, Campbell-Johnson (deviation value of 1.03) and Sublette-Teton-North Lincoln (deviation value of 1.02), were added to yield a list of districts electing 16 Senators, a bare majority. These two districts were the least under-represented of the remaining districts.

CONCLUSION: 47.42% of the population elected 53.33% of the Senators under this apportionment. (*Schaefer v. Thomson,* 251 F. Supp. 450, D. Wyo. 1965.)

1963 APPORTIONMENT
WYOMING HOUSE OF REPRESENTATIVES
1960 POPULATION OF STATE - 329,646

- - - - - - - - - - -

MINIMUM POPULATION ELECTING
A MAJORITY OF REPRESENTATIVES

- - - - - - - - - - -

NUMBER OF REPRESENTATIVES - 61
MAJORITY OF REPRESENTATIVES - 31

"WORST-CASE" SCENARIO*

COUNTY	POPULATION	NO. OF REPRESENTATIVES
Carbon	14,937	3
Crook	4,691	1
Fremont	26,168	5
Laramie	60,149	11
Lincoln	9,018	2
Niobrara	3,750	1
Sheridan	18,989	4
Sublette	3,778	1
Teton	3,062	1
Washakie	8,883	2
Totals:	153,425	31

Total population of listed counties, divided by total population of the state, yields the percentage of population represented by a majority of Representatives.

153,425 ÷ 329,646 = 46.54% of population
31 ÷ 61 = 50.82% of Representatives.

* The "worst-case" scenario is developed by selecting counties that are over-represented (or near to ideally represented) with a sufficient number of representatives to yield a majority in the House. Here, Laramie County (deviation value of 1.01) was substituted for Albany County (deviation value of 0.99) to bring the total of Representatives to 31.

CONCLUSION: 46.54% of the population was represented by 50.82% of the Representatives in the House following the 1963 apportionment. (Laws 1963, Ch. 22, §3).

1971 APPORTIONMENT
WYOMING HOUSE OF REPRESENTATIVES
POPULATION OF STATE - 332,416

- - - - - - - - - -

MINIMUM POPULATION ELECTING
A MAJORITY OF REPRESENTATIVES

- - - - - - - - - -

NUMBER OF REPRESENTATIVES - 62
MAJORITY OF REPRESENTATIVES - 32

"WORST-CASE" SCENARIO*

COUNTY	POPULATION	NO. OF REPRESENTATIVES
Big Horn	10,202	2
Carbon	13,354	3
Crook	4,535	1
Laramie	56,360	11
Lincoln	8,640	2
Natrona	51,264	10
Niobrara	2,924	1
Sublette	3,755	1
Teton	4,823	1
Totals:	155,857	32

Total population of listed counties, divided by total population of the state, yields the percentage of population represented by a majority of Representatives.

155,857 ÷ 332,416 = 46.89% of population
32 ÷ 62 = 51.61% of Representatives.

* The "worst-case" scenario is developed by selecting counties that are over-represented (or near to ideally represented) with a sufficient number of representatives to yield a majority in the House. Here, all over-represented counties, including all shown above and Albany and Hot Springs Counties, elected 38 Representatives. Albany County (deviation value of 0.99) and Hot Springs County (deviation value of 0.92), with six seats, were deleted from the list to leave nine counties which elected 32 Representatives, a bare majority.

CONCLUSION: 46.89% of the population was represented by 51.61% of the Representatives in the House following the 1971 apportionment. (Laws 1971, Ch. 161, §§3, 5).

1981 APPORTIONMENT
WYOMING HOUSE OF REPRESENTATIVES
POPULATION OF STATE - 469,557

. . . . . .

MINIMUM POPULATION ELECTING
A MAJORITY OF REPRESENTATIVES

. . . . . .

NUMBER OF REPRESENTATIVES - 64
MAJORITY OF REPRESENTATIVES - 33

"WORST-CASE" SCENARIO*

COUNTY	POPULATION	NO. OF REPRESENTATIVES
Albany	29,062	4
Big Horn	11,896	2
Carbon	21,896	3
Converse	14,069	2
Crook	5,308	1
Fremont	38,992	5
Goshen	12,040	2
Hot Springs	5,710	1
Johnson	6,700	1
Lincoln	12,177	2
Niobrara	2,924	1
Park	21,639	3
Platte	11,975	2
Sublette	4,548	1
Uinta	13,021	2
Weston	7,106	1
Totals:	219,063	33

Total population of listed counties, divided by total population of the state, yields the percentage of population represented by a majority of Representatives.

219,063 ÷ 469,557 = 46.65% of population
33 ÷ 64 = 51.56% of Representatives.

* The "worst-case" scenario is developed by selecting counties that are over-represented (or near to ideally represented) with a sufficient number of representatives to yield a majority in the House. Here, 15 over-represented counties and Fremont County (deviation value of 1.06) would elect 33 Representatives, a bare majority. No over-represented counties were omitted.

CONCLUSION: 46.65% of the population will be represented by 51.56% of the representatives in the House under this apportionment. (Laws 1981, Ch. 76, §§1, 30).

1981 APPORTIONMENT
WYOMING HOUSE (MODIFIED)
POPULATION OF STATE - 469,557

- - - - - - - - - -

MINIMUM POPULATION ELECTING
A MAJORITY OF REPRESENTATIVES

- - - - - - - - - -

NUMBER OF REPRESENTATIVES - 63
MAJORITY OF REPRESENTATIVES - 32

"WORST-CASE" SCENARIO*

COUNTY	POPULATION	NO. OF REPRESENTATIVES
Albany	29,062	4
Big Horn	11,896	2
Carbon	21,896	3
Converse	14,069	2
Crook	5,308	1
Fremont	38,992	5
Goshen-Niobrara	14,964	2
Hot Springs	5,710	1
Johnson	6,700	1
Lincoln	12,177	2
Park	21,639	3
Platte	11,975	2
Sublette	4,548	1
Uinta	13,021	2
Weston	7,106	1
Totals:	219,063	32

Total population of listed counties, divided by total population of the state, yields the percentage of population represented by a majority of Representatives.

219,063 ÷ 469,557 = 46.65% of population
32 ÷ 63 = 50.79% of Representatives.

* The "worst-case" scenario is developed by selecting counties that are over-represented (or near to ideally represented) with a sufficient number of Representatives to yield a majority in the House of Representatives. The same counties were selected as for the 1981 House Apportionment (Official), except that Goshen and Niobrara Counties were joined into one Representative district.

CONCLUSION: 46.56% of the population would be represented by 50.79% of the Representatives under this plan.

COMPARATIVE SUMMARY

One of the named plaintiffs lives in each of the Wyoming Counties listed below.

This table depicts a comparison of each county's representation in the Wyoming House, as a percentage:

$$\frac{\text{Number of Representatives from the County}}{\text{Total Number of Representatives in the House (x 100 = \%)}}$$

Each county's "percentage of representation" is shown for two alternative apportionments - the 1981 Apportionment enacted at W.S. 28-2-109 (a) (64 seats) and the apportionment that would result from a combination of Niobrara and Goshen Counties into one Representative District (63 seats).

The right hand column contains the numerical difference between these apportionments, for each county. The representation of each respective county in a 64-seat House was subtracted from the representation in a 63-seat House. The differences are shown as 100ths of one percent; in decimal form they would be shown as .0010, .0007, and so forth.

County	% of 64 House seats	% of 63 House seats	Difference
Albany	6.25	6.35	10/100ths of 1%
Campbell	4.69	4.76	7/100ths of 1%
Carbon	4.69	4.76	7/100ths of 1%
Fremont	7.81	7.94	13/100ths of 1%
Laramie	14.06	14.29	23/100ths of 1%
Sheridan	4.69	4.76	7/100ths of 1%
Teton	1.56	1.59	3/100ths of 1%

GOSHEN COUNTY REVENUE

1979-1981 (in thousands of dollars)

Revenue Source	FY1979	FY1980	FY1981	Authorizing State Statute
Assessed Valuation	$40,425	$42,227	$45,227	
Property Tax	448	485	535	Art. 15, §5
Sales & Use Tax	349	397	355	W.S. 39-291, 39-306-1, 39-311, 39-331
Gasoline Tax	115	130	138	W.S. 39-6-210
Cigarette Tax	20	13	11	
Payment in Lieu of Taxes	0	16	15	Fed.
Licenses, fees, & fines	171	128	131	
Investment Income	56	103	50	
Revenue Sharing	112	139	140	Fed.
Miscellaneous	295	117	185	
Bond Retirement	142	142	7	
Sanitary Engineer	13	11	17	
TOTALS[1]	1,721	1,681	1,584	

[1] Totals do not include cash reserve or carry-over cash balance.
Source: Goshen County Budgets

NIOBRARA COUNTY REVENUE

1979-1981 (in thousands of dollars)

Revenue Source	FY1979	FY1980	FY1981	Authorizing State Statute
Assessed Valuation	$22,657	$25,487	$41,588	
Property Tax	166	261	477	Art. 15, §5
Sales & Use Tax	64	76	94	W.S. 39-291, 39-306-1, 39-311, 39-331
Gasoline Tax	60	67	65	W.S. 39-6-210
Cigarette Tax	2	2	2	
Payment in Lieu of Taxes	87	64	85	Fed.
Licenses, fees, & fines	33	46	48	
Investment Income	25	26	38	
Revenue Sharing	79	72	63	Fed.
Miscellaneous	9	2	28	
Rent	10	9	17	
Bond Retirement	43	45	48	
TOTALS[1]	578	670	965	

[1] Totals do not include cash reserve or carry-over cash balance.
Source: Niobrara County Budgets

COMPARISON OF TAX COLLECTIONS AND RECEIPTS

FY1981

Niobrara County			
Tax	$ Collected	$ Received	$ Difference
Sales & Use Tax[1]	$ 779,270	$386,430	-$392,840
Gasoline Tax	281,976	35,247	- 246,729
Cigarette Tax	39,156	24,179	- 14,977
Total	$1,100,402	$445,856	-$654,546

Goshen County			
Tax	$ Collected	$ Received	$ Difference
Sales & Use Tax[1]	$2,349,315	$835,092	-$1,514,223
Gasoline Tax	573,448	71,681	- 501,767
Cigarette Tax	138,369	85,443	- 52,926
Total	$3,061,132	$992,216	-$2,068,916

[1] Niobrara County collects the 1% optional sales tax; Goshen County does not.

Source: Wyoming Department of Revenue and Taxation, *Annual Report*, 1981.

Niobrara County Comparison
of Projected 2% Severance Tax
Collections and Receipts

Year	Total Value of Oil & Gas Production	Amount of 2% Severance Tax Collected	Amount of 2% Severance Tax Received[1]	Amount Difference
FY1982	$40,987,500	$ 819,750	$ 235,828	-$ 583,922
FY1983	41,943,218	838,864	253,485	- 585,379
FY1984	47,321,019	946,420	306,372	- 640,048
FY1985	52,511,240	1,050,225	360,628	- 689,597
		$3,655,259	$1,156,313	-$2,498,946

[1] Amount of 2% severance tax received includes Lusk and Niobrara County. Negligible amounts received by small communities has not been included.

Source: Legislative Services Office, Audit Division, *Taxes on Wyoming Minerals: History and Projections,* 1981.

Goshen County Comparison
of Projected 2% Severance Tax
Collections and Receipts

Year	Total Value of Oil & Gas Production	Amount of 2% Severance Tax Collected	Amount of 2% Severance Tax Received[1]	Amount Difference
FY1982	$ 88,536	$1,771	$ 833,625	+$ 831,854
FY1983	92,245	1,845	896,040	+ 894,195
FY1984	98,282	1,966	1,082,991	+ 1,081,025
FY1985	100,035	2,001	1,274,739	+ 1,272,738
TOTAL		$7,583	$4,087,395	+$4,079,812

[1] Amount received includes Torrington and Goshen County.

Source: Legislative Services Office, Audit Division, *Taxes on Wyoming Minerals: History and Projections*, 1981.

Goshen County School District # 1 Revenue 1979-1980

Revenue Source	FY1979 Revenue Amount	Per ADM	State Ave. Per ADM
Assessed Valuation	$ 40,425		
Local Source	1,343,184	538	962
County Sources	688,016	276	507
State Sources	3,731,839	1,496	669
Federal Sources	3,297	1	52
Total	5,766,336	2,311	2,190

Revenue Source	FY1980 Revenue Amount	Per ADM	State Ave. Per ADM
Assessed Valuation	$ 42,227		
Local Source	1,566,242	637	1,121
County Sources	714,158	290	558
State Sources	4,977,957	2,024	948
Federal Sources	2,578	1	43
Total	7,260,935	2,952	2,670

Revenue Source	FY1981 Revenue Amount	Per ADM	State Ave. Per ADM
Assessed Valuation	$ 45,227		
Local Source	1,669,016	703	1,366
County Sources	817,351	344	653
State Sources	5,623,617	2,369	1,114
Federal Sources	5,680	2	74
Total	8,115,664	3,418	3,207

Source: State Department of Education, Statistical Report Series, Wyoming Public Schools Fund Accounting and Reporting, 1979, 1980, and 1981.

Niobrara County School District # 1 Revenue 1979-1980

Revenue Source	FY1979 Revenue Amount	Per ADM	State Ave. Per ADM
Assessed Valuation	$ 22,657		
Local Source	687,535	1,163	962
County Sources	373,672	632	507
State Sources	339,672	575	669
Federal Sources	0	0	52
Total	1,400,879	2,370	2,190

Revenue Source	FY1980 Revenue Amount	Per ADM	State Ave. Per ADM
Assessed Valuation	$ 25,487		
Local Source	750,907	1,313	1,121
County Sources	383,247	670	558
State Sources	498,820	872	948
Federal Sources	0	0	43
Total	1,632,974	2,855	2,670

Revenue Source	FY1981 Revenue Amount	Per ADM	State Ave. Per ADM
Assessed Valuation	$ 41,588		
Local Source	1,164,212	2,042	1,366
County Sources	580,399	1,018	653
State Sources	302,959	531	1,114
Federal Sources	0	0	74
Total	2,047,570	3,591	3,207

Source: State Department of Education, Statistical Report Series, Wyoming Public Schools Fund Accounting and Reporting, 1979, 1980, and 1981.

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THE TOWN OF LUSK.

The Future Capital of Niobrara County . . . Fine Lands, Mines, Coal and Timber.

The Greatest Stock Shipping Point in the West— 40,000 Head of Cattle Shipped Last Fall.

Lusk lies in the fertile valley of the Running Water about 30 miles from the Nebraska line, on the Wyoming Central railroad. The country around it is being rapidly taken up. It is the shipping and trading point for the largest cattle ranches in the Northwest. Nearly 40,000 head of cattle were shipped from here last fall. These facts make it a very desirable point for merchants.

A temporary town was started about a year ago one mile west of its present site, but on the advent of the railroad a townsite was laid out in its present picturesque and advantageous situation. The first lots were sold on the 20th of last July, and it now has a population of 400 which number will be doubled in the next three months.

Lusk is 45 miles north of Ft. Laramie, 150 north of Cheyenne, 55 east of Douglas and 85 west of Chadron, Neb.

Laramie county is acknowledged to be entirely too large, and there is not the least doubt but the next winter's session of the legislative assembly will divide it just south of Ft. Laramie, when Lusk will be the only town of any description in the new county, and will, of course, be the county seat.

OUR BUSINESS MEN.

Starting from the depot and going south along the west side of Main street we find the following firms doing business.

Dennis Collins, propr. Collins House. Wm. Collins, Grocery. Cleveland Bros., Billiard hall and Saloon. John Cross, Saloon. Jacob Berkman, News Stand. Lusk Meat Market. Barber Shop. W. S. Peck, Barber Shop and Bath Rooms. Peter Sweeney, Saloon. Baker & Johnson, wholesale and retail General Merchandise and ranch supplies. City Drug Store. Richards Brothers, Bank. Baker Brothers, wholesale and retail Groceries, Clothing, hats, caps boots and shoes, and General Ranch supplies, also post office. S. Adamsky, Clothing, gents' furnishing goods, boots and shoes, hats and caps, etc. J. D. Waters, Saloon. A. Hughes, Restaurant. Bostelman & Co., Pioneer Drug Store. F. E. Aken, Jewelry. Frank Palmer, Photographer. HERALD office. O. P. Goodwin, Meat Market. J. F. Patterson, dry goods, clothing, boots and shoes, furnishing goods and groceries. Brooks & Son, Brooks House. O. P. Goodwin,

restaurant. Misses Eng & Larson, Restaurant.

Turning and going north on the east side of Main street we pass. D. A. Wucherer, Boots and Shoes. Mrs. Loud, Restaurant. Fred Schwartz, Meat Market. A building used for flour and feed by Baker Bros. F. L. Ketchum, Confectionery etc. Wm. Criswell, public hall. Jack Huff, Harness shop. E. E. Lonabaugh, law and real estate office. M. C. Anderson, Manager Lusk Hardware. J. L. Hogle, Saloon. B. S. Hart, City Hall, with Hogle's boarding house below. A. Tanghe, Bakery. Huling & Cerns, law and real estate. Mrs. Langworthy, Millinery etc. Bryson & Gustine, Chop House. Depot Restaurant by W. Allen. R. Beare, Bakery.

On East Second street are Redington & Co's livery barn, and wagon, buggy, coal and wood emplorium. Kingman & Son, Lumber. J. K. McCann, Law, etc.

On West Second street we find the Wyoming Lumber Co., managed by J. E. Rugg. J. P. Allbee, Blacksmithing.

Opposite the depot is B. W. McClure's Livery barn.

Our carpenters are Bruce & Castle, Chamberlain & Loblein, C. C. Keck & Bro and Louger & Bagley.

Look to the Future.

It is a fine remark of Emerson's that while simple minded men can see farms that are improved or cities that are builded, the wise man sees possible farms and cities. To reason that because a thing does not exist it cannot and will not exist is the acme of foolish reasoning. It is a fact of common observation that comparatively few men have been far-sighted enough to profit by the development of the west. We sometimes hear it said from a hasty superficial view that Wyoming will not sustain a large population. Which Wyoming, that of today or that of the future? We have cast our fortunes with the Wyoming that is to be, not the Wyoming of the past or the present. Fetterman has answered very well, the need of Central Wyoming for a few years. The Wyoming in the days of Fetterman's supremacy was a region undeveloped, practically a wilderness. Wyoming the wilderness is fast passing into history. We have to do with another Wyoming, with resources developed, industries diversified, population numbered by hundreds of thousands. Does any one imagine that the tide of western immigration is going to stop at the Wyoming line because the country beyond is broken and appears barren? Bless your dear heart my croaking friend your wisdom is sheer folly and your song a very old one. The same refrain was heard in Eastern Nebraska a few years ago and has been heard all along the line from the Mississippi

west. There have been a great many of your people in times past. They were troubled with doubts and fears. The country west of them certainly did look barren; uncultivated regions usually do; the soil, unquestionably appears to be sandy as the finest soil usually does until cultivated. Doubts and fears in the matter of the development of the west are very poor counselors. All along the line you can find hundreds of men who staid with their "questionings" and today enjoy the unique felicity of wearing holes in their apparel. The men who figure on the future make the fortunes. Wyoming a region of wonderful and manifold resources is destined to become one of the greatest and wealthiest states of the Union.
— Douglas Advertiser.

Why Our Winters Are Mild.

We believe it is not generally known in localities east of here that northwest winds (the coldest wind they have) are by far the warmest winds in this locality. Our south and other winds are not unlike those of Iowa, but our northwest winds seldom fail to cut off the snow if there be any on the ground. There is a tract of country in Wyoming west of the Black Hills, much of it fine agricultural land, is known as the Powder river country, but called medicine ground by the Indians because of its warm temperature. This country lying northwest of us, we believe the immediate cause of our northwest winds being so warm. The Box Butte country will produce fine winter wheat, and any fruits that can be raised in northern Missouri and Kansas. —Grip.

Which remarks apply equally as well, if not better, to the Runningwater valley in Wyoming.

Our Winter.

People down the road seem to think we are having a very severe winter up here, because the trains are occasionally blockaded. The fact is that in the present condition of the cuts on this line of road, two inches of snow and a little wind fill these cuts full and block the road for several days. Eighteen ° below zero is not severe weather, by any means, and it has fallen that low only once.

Intervening Defendant s Exhibit-DD
Reprinted from the Lusk Herald. June 2. 1910

The Lusk Herald

G. C. and A. H. FORSYTHE Publishers

TERMS

One Year (in advance) $3.00

Entered November 17, 1863, at Lusk, Wyoming, a second-class matter, under Act of Congress of March 3, 1879.

THURSDAY, JUNE 2, 1910

Is there a dearth of Democratic timber or are they only playing 'possum?

Don't let us overlook the fact that "charity should begin at home", although it should not stay there.

"To be or not to be" a candidate, that is the question. Whether is it more noble to go after it or wait until the mantle falls on our shoulders?

Most everyday brings a new candidate for some of the State offices on the Republican side. Certainly the office will not have to hunt the man and are we not to be congratulated on the fact that so many "tried and true" are willing to serve their county?

One important item of legislation, and one only, concerns us next winter, and that is the equitable division of Converse county. To further this laudable purpose, we must send a man from this end of the county who has had experience in dealings with men; a man who is a "mixer"; a man who understands the ins and outs in politics; a man who is not easily discouraged; a man who cannot be bribed nor swerved from his purpose; in short, a man who will have in mind his constitutents and their desires "first last and all the time." What man is there to fill the bill?

Intervening Defendant's Exhibit-EE
Reprinted from the Lusk Herald, Dec. 1, 1910

DECLARE UNANIMOUSLY FOR COUNTY DIVISION

Great Enthusiasm Manifested, Permanent Officers Elected and Committees Appointed for Work.

If the citizens of Lusk and vicinity could ever have been called apathetic in the matter of upholding civic pride, certainly the stigma was entirely wiped out last Saturday night when the most enthusiastic, most representative, most harmonious outpouring of its citizens ever assembled, met in Fraternity hall to take up in earnest and carry to a successful issue the matter of County Division. There was not one dissenting voice nor any expression which could be construed as antagonistic to the purpose for which the meeting was called.

Intervening Defendant s Exhibit-HH
Reprinted from the Lusk Herald, Jan 5 1911

ADVANTAGES OF LUSK

Some Cogent Reasons Why Settlers Looking for the Best Should Settle Here in Lusk or Vicinity.

Lusk is twenty-five years old and its marvelous growth in the last few years is the wonder of central and eastern Wyoming. Its growth is healthy, normal, not forced, and it will continue thus indefinitely.

Lusk is surrounded on all sides by the finest grazing land in the State. Experts say that the soil is the most productive of any and that the renown of this district as a dry farming section will reach far and near, after the farmer gets right down to business.

Lusk has two churches, Congregational and Episcopal, and it is fully expected that a Roman Catholic church will be added this year. The Lutherans hold services and a Baptist church has lately been organized a few miles northeast of Lusk.

Lusk has one of the finest High and Public School buildings in the State today, with a corps of instructors capable in every way, and this alone should be a good argument in favor of locating here.

Lusk is situated on the main line of the Chicago & Northwestern railroad and is the gateway to a land which is only commencing to be settled up.

Lusk is the central trading point for a vast territory and its trade is growing with the development of the surrounding country.

Lusk has an unprecedented demand for dwelling houses, and every year sees a number erected. Lusk is fast becoming a beautiful "city of homes."

Lusk is the best town east of Douglas and it will not be so very long when it will be crowding the city of "destiny."

Lusk has a number of good business houses and its business and professional men are progressive, active and alert.

Lusk has a Commercial Club composed of its solid citizens, ready to support any legitimate enterprise which would be for the good of the community. A Creamery and an Electric Lighting Plant are now under advisement.

Lusk has a good water works system, and will have a splendid sewerage system installed before the end of another year.

Lusk is, in short, progressive, wide-awake, substantial, a good place to live in.

Intervening Defendant s Exhibit-KK
Reprinted from the Lusk Herald, Apr. 27, 1911

Mr. and Mrs. Honest Voter

It is Now Up to You.

The Decision in Regard to County Division Rests With You; Weigh The Matter Well and Vote According to the Dictates of Your Conscience

The last argument for and against division will be made this week and nothing will remain to be done that the voter cannot do. It is now up to the qualified electors to say whether they favor the matter or not. No telling arguments have been made by the opponents of division, in fact, what little in quality though much in quantity has been said, carries no weight because of want of sincerity on the part of those making the charges. Fancy a man getting indignantly eloquent over the charge that the new county will have to assume a debt of $7,000.00, and writing columns about the fearful consequences; while the same individual a short time ago was willing and anxious; aye and is now, to saddle a debt of $30,000.00 on school district No. 2, for the erection of a school building which they could not fill in fifty years. The voters should not listen to this kind of slush for the simple reason that their statements lack sincerity and truth. Niobrara county will not have to assume any indebtedness at all, but as was shown lately in these colums, we have a substantial credit coming. A good argument in favor of division is the fact that all the large stock and sheep men, and all the prominent business men, all the people with large holdings are favorable to division. Knowing as they do that they will have to pay the big end of the taxes, do you suppose that merchant Snyder or Jacob Mill, Albert Rochelle or Billie Reynolds, Eugene Willson or Henry Gray, or in fact anyone with large property interest would advise division if he expected his taxes to be materially increased? Not on your tintype! We are as ready now for division as we will be ten years from now, so why should the matter be put off? Nothing can be gained, no good end can be served by putting off longer. VOTE FOR DIVISION!

Reasons for Division

LOWER TAXES

The first and most important reason is lower taxes, by reasons of the fact that Niobrara will be a third class county, resulting in greatly reduced salaries, no deputies and a much greater reduc-

tion in mileage and per diem fees caused by the shorter distance and time consumed in travel.

HOME GOVERNMENT

Government representation of our own; instead of voting to elect officers residing in Douglas and the west end to look after our affairs; we will be in a position to elect our own representatives who understand and are interested in our welfare, and not that of Douglas.

CENTRALLY LOCATED COUNTY SEAT

Instead of the residents of this end of the county having to take long, tedious journeys to the present county seat, we can choose a county seat location, central and easily accessible to all. At the present time personal petitions for the rebatement of erroneous taxes, possibly not exceeding $20.00 in amount, do not warrant a trip to the county seat because the expense of making such trip would exceed the amount of the rebate.

GOOD ROADS

In 1900 there was spent for roads in Converse county $8,762.32 of which what is now Niobrara received the insignificant sum of $635.68 as her share. This is poor treatment for us seeing that roads are badly needed in northern and eastern districts of the new county. When we organize Niobrara we will spend our own money in our own territory for roads and other necessary improvements.

NO BONDED INDEBTEDNESS

Under the laws of this state, as outlined and explained in another article in this issue, Niobrara will start free from any bonded indebtedness and with a substantial credit. Platte and Goshen counties, which have just voted for division, and have to assume large bonded indebtedness by reason of the impoverished state of Laramie county, carried for division by large majorities. Being in a much stronger financial condition, we will reap all the benefits and none of the disadvantages these two new counties will have to assume.

To sum up, every existing county today had to make a beginning and not one of them started out with the same bright prospects that lie in the path of Niobrara. Converse county had to assume a debt of one hundred thousand dollars when old Laramie was divided and look at her record. Only twenty thousand dollars bonded indebtedness, all of the old debt paid off and able to spend between forty and fifty thousand dollars for expenses yearly. With a salary and expense list of less than sixteen thousand dollars and with not one cent of indebtedness to carry don't you think that Niobrara can set up house-keeping without any fear of keeping the wolf from the door?

Personal Opinions

I favor county division because I believe we will get lower taxes thereby.

Jacob Mill

A home county government will give us more money for and hence better roads; we need them up north and all settlers up there should vote as I am going to do—for division.

Albert Rochelle

I may be a little optimistic in my opinion, but I firmly believe that land values will go up with the organization of the new county.

Thos. Bell

In my opinion the taxes cannot be any higher, because the running expenses of the county will be very small.

C. L. Christian

County division is going to be a good thing for us, it will bring us nearer together and create a community interest.

J. C. Deuel, Kirtley, Wyo.

Certainly if county division is good for the people of Platte and Goshen counties, it cannot hurt us, especially when we have no debt to assume.

Ed. Arnold

As a business man, I believe that with the county affairs handled economically as they are sure to be, good results will be achieved.

H. N. Callander

I am going to vote for county division, not for the purpose of raising my taxes but of lowering them. You should do the same.

H. C. Snyder

We will have more money to spend for roads and that is an important thing to us who live in the country. I believe we can have this and still keep the tax rate down.

John C. Sturman

County division will bring the county seat nearer to us up north, thereby saving us money and time when we have business at the seat of government.

L. E. Baltzley

I have always worked for the interests of the dry farmer and strongly favor county division because I believe it will benefit them.

R. C. McCulley

I have no property in Lusk, but am largely interested in land in the east end of Niobrara and believe division will advance the value of land without increasing the taxes.

Geo. H. Voorhees

Division of the county will, in my opinion, greatly reduce the hitherto high cost of criminal prosecutions, by reason of the big reductions in the mileage and expense of officers witnesses and jurors.

Sol J. Weil, Attorney.

Figures Tell the Truth

Figures don't lie unless they are distorted: the following figures are truthful and you know them to be so; they have not been denied by the Manville hired man nor by any one else, and you are requested to look 'em over once more and form your own conclusions. There is no attempt being made to force you to believe something that is impossible; rather we are trying to guard you from misrepresentation and misinformation.

	Converse	Niobrara
Court Clerk	$1,200.00	$ .....
County Clerk	1,800.00	1,200.00
Deputy Clerk	1,000.00	.....
Sheriff	1,800.00	1,500.00
Under Sheriff	900.00	900.00
Treasurer	1,800.00	1,000.00
Deputy	900.00	.....
Attorney	1,500.00	800.00
Assessor	1,500.00	1,200.00
Deputy	600.00	.....
Co. Sup't	900.00	600.00
Commissioners	1,500.00	750.00
Totals	$15,400.00	$7,950.00

How about these? The class the county is in counts for something and the DEPUTY cuts some ice; yes, he cuts into your pocketbook too.

Expense of running Converse county for 1910 $43,381.13

Expense of running Niobrara county for 1913 $15,750.00

This is a little problem in addition or mayhap in subtraction; but

we think the easiest way to solve it is by DIVISION. Try it that way.

Valuation of Niobrara (not less than) four millions. At 4 1-2 mills, the 1910 rate, there can be raised seventeen thousand dollars. We don't need that much, so of course the wise thing for our commissioners to do, is to cut down the levy, and that is just what they will do. All of the above figures point in one way only—to LOWER TAXES and to an economical home government.

Yes—Lusk

She took her little pen in hand
And gripped it tight, I guess,
She wrote the word that sealed her fate;
The mystic word was "YES."

He took her to the polls to vote
And there, I must confess,
Tho' never cross, a cross she wrote
After the one word, "YES."

It was not hard for her to choose
A town for county seat,
The HERALD had expressed her views
Which now it will repeat;

One town of all the candidates
Proves itself re-cher-che,
Each one of them it antedates
It spells L-U-S-K.

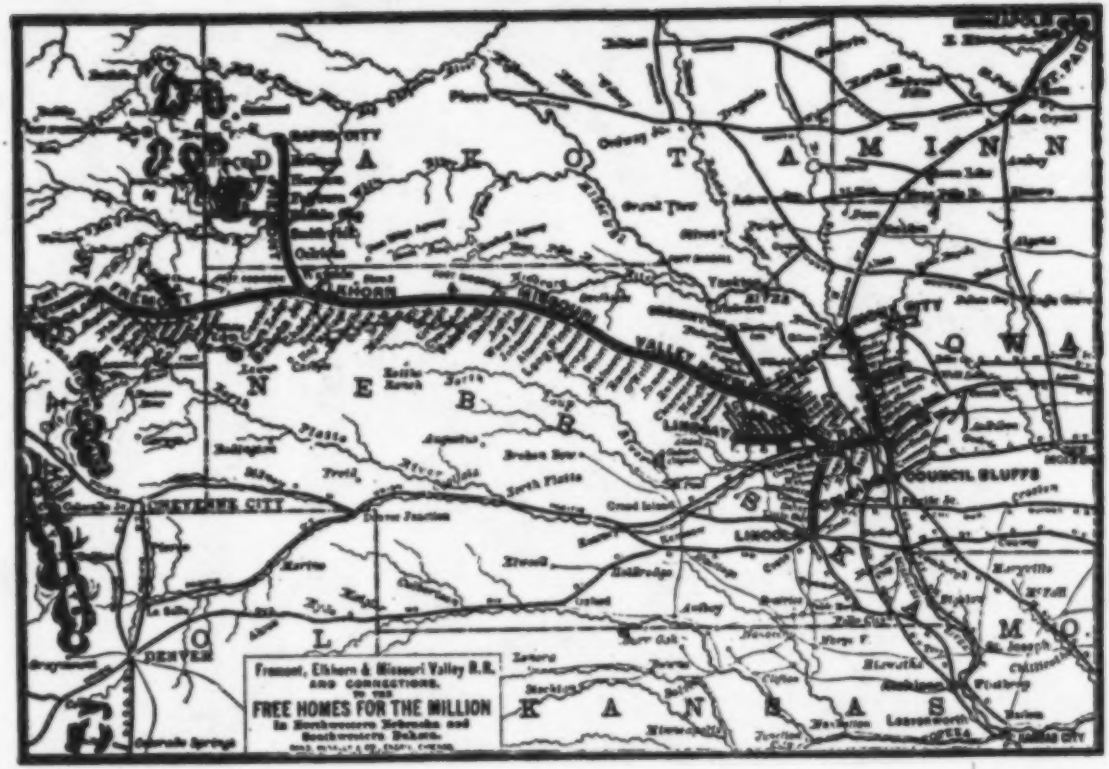
Telling Arguments.

Facts and Figures Which cannot be Refuted Nor Denied.

On Tuesday next, the second day of May, we, the people of the proposed new county of Niobrara, will have the opportunity to determine whether or not there shall be a new county of Niobrara.

The opportune time is at hand for the tax payer to obtain for himself, benefits that will come with the creation of the new county of Niobrara—by this I mean an advantage to the tax payer that is not afforded by any of the counties now asking creation throughout our state. By comparison I call your attention to Laramie county, which today is carrying the Cheyenne and Northern bonded indebtedness to the extent of $337,000.00 of which Goshen and Platte

Intervening Defendant's Exhibit-CC
Reprinted from the Lusk Herald, Feb. 18, 1887



Map of the F. E. & M. V. and Wyoming Central Railroads, Showing how to reach LUSK and the Rich Agricultural, Grazing and Mineral Country in Eastern Wyoming, of which LUSK is the Center.

have assumed their proportionate share. WHICH THE PEOPLE OF THESE COUNTIES ASSUMED AS REASONABLE BY CASTING A MAJORITY VOTE to create these counties at the election held last Tuesday, and Campbell county is seeking admission on a much lesser valuation and population. The proposed new counties in the northwestern part of the state are seeking admission, facing an enormous expenditure, to build roads through their mountains and bridge their rivers and streams, and in one instance a proposition is already up to build a $40,000 court house—but they can see the benefits in spite of all these drawbacks of a new organization.

As to ourselves. We start business with a clean slate. As has been stated elsewhere, our debits and credits with the county of Converse offset one another. Therefore we do not assume a large bonded indebtedness; we have a good, strong valuation and more than a sufficient population. Our county will be a third class county which means a minimum cost of maintenance, as compared with the high cost of maintaining the county of Converse, a first-class county.

Owing to our most favorable geographical situation, we do not face a big outlay of money in the construction of mountain roads and bridging large rivers. We will have excellent roads throughout our entire county at a cost that will scarcely be noticed by the tax payers. We all know what WE have been getting on the road proposition.

Above all, the solid, substantial ranchmen, many of whom come from the remotest part of the proposed county of Niobrara, and the sound, conservative business men of Lusk, who have taken an active interest in county division, have pledged themselves to the people not to build a court house or enter into any unnecessary expenditures for a period of years. This to me, as a taxpayer, means much. I believe in the integrity of these men. I have personally investigated the pro and con of county division. I have carefully watched the statements of our local papers, and I have yet to see the first exaggerated statement in favor of county division.

A glance at the map will convince anyone that Lusk is the logical point for the county seat, it being the most centrally located of any of our towns.

I therefore shall cast my ballot for the creation of Niobrara County, and Lusk as the county seat."

Russell Thorp.

Intervening Defendant s Exhibit-LL
Reprinted from the Lusk Herald Sept 7 1911

Lusk the Metropolis of Eastern Wyoming

The County Seat of Niobrara; a Growing City; Great Shipping Point; Distributing Center for Immense Territory

Situated on the main line of the Chicago & North Western Railroad, with a population of over 600, Lusk is geographically in the center of the county from east to west and easily accessible from any quarter, and is the gateway to an immense territory, the possibilities of which are only being exploited.

Lusk is the largest and oldest town in Niobrara, and its marvelous growth in the last few years is the talk of this part of the State. Its growth has been normal, natural, healthy, and there has been no attempt to "boom" our city.

In her progressive strides, Lusk has not forgotten the matter of the education of the rising and future generations and last year erected one of the finest High and Public School buildings in the State, costing about $35,000, with a corps of capable instructors and an efficient superintendent.

Lusk has two church buildings, Congregational and Episcopal, and it will only be a short time when the Roman Catholics will begin the erection of a place of worship, as they have already secured the ground and the needful funds for the building have been partly subscribed. The Lutheran denomination has a resident missionary here and services are held at stated times, and a Baptist church was lately organized a few miles north-east of Lusk.

Lusk's public hall, owned by the Odd Fellows, is a credit to the town; it has a fine dancing floor and a large and well appointed stage; when the dressing and toilet rooms in the basement have been completed it will be quite up-to-date. There is a fine lodge room on the second floor.

Lusk is the central trading point for an immense territory, ranchmen and farmers from the north coming fifty miles and more for their supplies, and its trade is growing yearly with the development of the district.

There is an unprecedented demand in Lusk for dwelling houses and each succeeding year sees a number erected. Lusk is fast becoming a city of beautiful homes and the owners take pride in keeping their lawns and flower gardens in order, thus adding to the attractiveness of our little city. Over 35 residences and business houses have been built in the last three years.

As will be seen from the advertisements in this issue, Lusk has

her quota of business houses and it can be said of her business and professional men that they are active, alert and progressive.

Lusk has a fine water works system, the water being pumped into two large reservoirs on top of Reservoir Hill, thus insuring ample protection in case of fire.

Lusk has lately installed a sewerage system, which, in conjunction with the unfailing supply of pure cold water, is a safe-guard for the sanitation of the town and health of its people.

A telephone system, with the most modern equipment, is now in operation and connects all parts of the county in one central exchange with facilities for long distance connections.

Lusk boasts of more cement side-walks than any other town in the State of its size, and its streets are tidy and clean. Curbing is being put in on the residence streets and trees adorn the parkings.

The Masonic Fraternity of Lusk has under construction a $20,000.00 building which, when completed, will be a credit to the town. The main floor will be occupied by two store rooms; the second containing offices and a fine lodge with accessory rooms in connection.

Lusk has one of the best hotels along the line of the C. & N. W., the "Northwesters;" its cuisine is unrivalled; it is now being fitted out with bathrooms and other modern conveniences; it is steam-heated and every room is well lighted.

For a town the size of Lusk its Band and Orchestra are second to none, composed entirely of local talent, they put in "their best licks" to attain prominence in the musical world and they surely are succeeding.

Lusk's ball club—the Invincibles—gave a good account of itself during the season just past, only one defeat being recorded against it, which is "going some."

The possibilities in the near future for Lusk are a Creamery and an Electric Lighting Plant, both of which utilities have been discussed by the Lusk Commercial Club.

To sum up, and looking at Lusk from social, business, educational and municipal standpoints, we have a city which is up to date, progressive, a good place to live in, with people who are neighborly and a set of officials whose sole aim is to give the town good government at a minimum cost. With all our improvements and civic works, the bonded indebtedness of the corporation is less than $20,000.00 and the taxes cannot be called burdensome.

NIOBRARA'S RESOURCES

Facts and Figures Concerning Chief Industries of Niobrara County

As a grazing country Niobrara in the years gone by, had a reputation not only state wide but which reached far beyond its confines and Lusk was the principal shipping point for the great herds which were annually shipped east. A transition has come and although the open range has been curtailed, there will always be leasable land for grazing purposes and more cattle will be fed than formerly, so that it is wise to conclude that the chief industries of our county will still be prosecuted. These are cattle and horse raising and wool and mutton growing, and a few figures are subjoined which will give a fair idea of the volume of business in these lines:

1911 Assessment Figures

Total valuation Niobrara County		$3,838,077.00
Cattle	27,107	625,000.00
Sheep	134,625	475,000
Horses	7,001	300,000.00

Shipped out 1910

Cattle	$735,625.00
Sheep	200,000.00
Horses	100,000.00
Wool	204,000.00

The wool clip for this year ran over 1,000,000 pounds, and of this amount about 600,000 pounds were stored in the Lusk Wool Warehouse at one time or another during the season. The proceeds from this year's clip should be between $140,000.00 and $150,000.00 at the prevailing prices.

Dry-farming has been prosecuted with varying decrees of success for over twenty years, principally in the Pleasant Ridge district and in the vicinity of Manville. When rains were seasonable fine crops have been raised, the oats and wheat of the Ridge being superior to anything grown anywhere and potatoes in both of these places surpassing any grown in the east.

It is an established fact that rye, fall wheat, oats and potatoes will bring good results. It is worthy of mention that the exhibit of grains, roots and vegetables from the vicinity of Lusk, at the State Fair last year, carried off the special medal in competition with all the dry farming districts in the state and having as a competitor Dr. Cook, dry farm expert from the State's experiment farm near Cheyenne, with samples of what were grown there.

Intervening Defendant s Exhibit-OO
Reprinted from the Lusk Herald Oct 9 1913

The Lusk Herald

G. C. and A. H. FORSYTHE, Publishers

Published Weekly at Lusk, Wyoming

TERMS

One Year (in advance) $1.50

Entered November 17, 1903 at Lusk, Wyoming, as second-class matter, under Act of Congress of March 3, 1879

THURSDAY, OCTOBER 9, 1913

The tariff bill was signed by President Wilson last Saturday night and one of the promises made by the Democratic party has been faithfully kept. The new tariff will bring lots of good to the masses of the people. The next step will be the passage of a new currency law, also intended to help business men, with limited capital but with large deposits of "honesty."

While our enthusiasm over the success of our first county fair remains and before it has entirely vanished would it not be well to get together and organize for future fairs? Grounds should be arranged for and the matter of erecting a building should be taken up seriously. Let those who were active in the conduct of affairs in the late exhibition call a mass meeting for such purpose.

George W. Dean, a business man of Pittsburgh, Penna., and a lifetime Republican, says business was never better in his home city than it is now and it makes him tired to hear the Republican papers hollering their heads off in a vain endeavor to make the people believe that the country is going to the demnition bow-wows on account of tariff revision. He can't get himself to take stock in such rot.

Niobrara County is the premier dry farming county of the state. In an address delivered last Thursday at the State Fair, Governor Carey made particular mention of Niobrara and Washakie counties, two of the new counties of the state. He regretted the absence of exhibits from some of the counties, and the rather poor showing made by others that could have done better, but there may be a

good reason for this. Many of the county fairs take place about the same time as the State Fair, and as there is a great deal of work connected with the collection and display of the products, it may be that those having charge of the work for their county fairs did not have the time to prepare for the State Fair. Niobrara county has the proud distinction of taking first premiums over stuff raised by irrigation. Farmers, keep a-going! That price of $25.00 per acre made in the late Russell sale may be a minimum price before long. Who knows!

1980 COMMUNITY PROFILE - TORRINGTON, WYOMING
Elevation 4,098 Feet

Population

	City	County
1970	4,237	10,885
1975	4,667	11,400
1979 (est.)	6,293	15,286

Recreation

6 Recreational Parks
Medicine Bow National Forest
Baseball, tennis, golf, swimming, fishing, snowmobiling, rodeos

Geographical

Torrington is located in Goshen County in southeastern Wyoming. The county covers an area of approximately 2,232 square miles of prime agricultural land.

Climate

Mean daily maximum temperature in:
January 40.9° July 89.3°
Mean monthly temperature in:
January 16.6° July 71.3°
Mean annual precipitation: 14 inches
Mean annual snowfall: 55 inches
Average annual wind velocity: 11 mph
Average annual relative humidity: 61%
Average growing season: 148 days

Resources

Minerals: Oil
Agriculture: Sugar beets, corn, potatoes, beans, alfalfa, oats, barley, wheat

Municipal Data

Government: Mayor - Council System
Police Force: 13
Sheriff's Office: 4
Fire Department: 40 man volunteer unit
Insurance Rating: 7
City Limits: 1,114 acres
Zoning: Act Administered by Planning Commission
Streets: 90% paved, all have gutters, 90% have sidewalks

Housing

	County
Single Family Units	3,722
Multi-Family Units	400
Mobile Homes	700

Estimated cost of a new 3-bedroom home, 1,100 sq. ft., unfinished basement, 1-car garage: $63,000

Average monthly rental, 3-bedroom home: $300-$400

Average monthly rental, 1-3 bedroom apt.: $250

Church

Protestant - 13, Catholic - 1, LDS - 1

Education

	Schools	Pupils
High School	1	517
Jr. High School	1	359
Elementary Schools	1	787
Other (Parochial)	1	63

Total Expended Per Pupil: $1,800

Ratio of Pupils/Teachers: 15:1

Eastern Wyoming College 740

Libraries: 2 (incl. college) Volumes: 56,854

Medical

Doctors: 8 Dentists: 4

Community Hospital: 56 beds

Goshen County Nursing Home: 71 beds

Media

Newspaper: Torrington Telegram, bi-weekly circulation, 3,500

Radio: KGOS AM, KERM FM

Television: No local station. 8 channels available with Cable

Accommodations

Motels: 11 Rooms: 167

Convention Facilities: 7

Room Capacities: 500, 400, 200 (three largest)

Business

Number of Retail Establishments - County: 101

Number of Wholesale Establishments: 34

Net Collection of Retail Sales Tax, FY'79: $1,223,685.51

Banks: 2
Total Deposits: $72,062,158.70
Total Assets: $79,776,756.14
Savings and Loans: 2
Total Assets: $35,000,000

Tax Structure

Wyoming has no state, personal or corporate income tax.

Assessed Valuation—
City: $9,428,205
County: $40,425,064

Property Taxes Levied—
City: $811,118
County: $3,279,042

Tax Levy (Mills)—
City: 86.031
County: 22.500

Bonded Indebtedness FY'79—
City: $350,000
School: $3,607,000

Sales Tax Rate: 3%

Sales Tax Collected FY'79—
County: $1,794,073.30

Sales Tax Distributed Back FY'79-
City: $258,676.89
County: $348,935.12

1979 minerals assessed valuation subject to severance and ad valorem taxes based on 1978 production is: $120,608.

Ratio of assessed valuation to true value for 1979 is approximately 8-10%.

Transportation

Highways:
US 85 and 26; State 156 and 159
Railroads:
Burlington-Northern
Union Pacific
Motor Freight Carriers:
West Nebraska Express
Hamilton Transfer
Air Service:
Torrington Municipal Airport. 2 runways, 2,800 and 5,200 feet, both asphalt
Charter Service:
Aviation Associates
Commercial Service:
Available in Cheyenne (84 miles) or Scottsbluff, Nebraska (35 miles)
Bus Service:
Trailways

Utilities

Municipal Water Source:
North Platte River and wells
Source capacity: 14.5 million gal/day
Peak demand: 2.5 million gal/day
Storage capacity: 350,000 gallons
Rates: First 5,000 gal. $3.00
Each additional 1,000 .25¢ winter, .13¢ summer

Sewage System—
3-Cell Lagoon Facility
Capacity: Will serve 6,000
Rates: (residential and commercial) $2.50/mo.

Refuse Disposal—
Method: Sanitary landfill
Rates: Residential - $5.00 month
Commercial - $10.00 month

Natural Gas—
Supplier: Kansas-Nebraska Natural Gas
Rates: General

First 10,000 cu. ft.	$3.22
Next 40,000 cu. ft.	.22719 per ccf
Next 450,000 cu. ft.	.20519 per ccf
Next 500,000 cu. ft.	.19619 per ccf

Electric Power—
Supplier: Bureau of Reclamation
City operates distribution system with five substations
*Rates - Residential

	per kilowatt
1st 15 kwh or less	1.075
Next 35 kwh	.055
Next 50 kwh	.039
Next 200 kwh	.03
Next 200 kwh	.025
Add'l over 500	.0245
Commercial	
First 100 kwh	.05
Next 200 kwh	.0475
Next 200 kwh	.0404
Next 1,000 kwh	.035
Add'l over 1,500	.025

*Other rate schedules are available.

Labor Market Analysis

1978 Per Capita Income - County: $6,888
(source: BEA, Regional Economic Information System)

County Labor Force -
1979 Annual Average: 6,096
Male: 4,148 Female: 1,948
Unemployment - 1979 Annual Average: 169
Male: 96 Female: 73
Unemployment Rate: 2.8%

Distribution of Labor Force-3rd Quarter 1979: Covered Employment

	No. Firms	No. Emp.
Mining & Construction	51	382
Manufacturing	14	278
Trans., Comm., & Utilities	24	191
Wholesale Trade	34	302
Retail Trade	101	726
Finance, Ins., Real Estate	22	108
Services with Agriculture, Forestry and Fisheries	87	1,181

Average Weekly Wage Rates:	County	State
Mining	$264.83	$427.09
Construction		336.04
Manufacturing	218.17	292.18
Trans., Comm., & Utilities	250.61	334.91
Wholesale Trade	173.62	300.89
Retail Trade	128.22	147.92
Finance, Ins., Real Estate	203.21	227.15
Services with Agriculture, Forestry & Fisheries	133.37	178.88
Average of All Categories	196.00	280.63

Industry

Agriculture, Manufacturing

Major Employers

	Product	Emp.
Holly Sugar Co.	Sugar Refinery	300
Simplot Soilbuilders	Fertilizer	10
Torrington Cement Co.	Cement	20
John Rueb Assoc., Inc.	Hides, Rendering	40
Farr-Wyoming Co.	Processed Beans	60
Z & W Mill	Grain & Feed	20

Available Industrial Properties

City owned industrial park adjacent to rail facilities. Contact Chamber of Commerce.

Cultural Attractions

Homesteader Museum
Oregon Trail Ruts
Register Cliff
Art Exhibits and Community Concerts

Further Information

Torrington Chamber of Commerce
350 West 21st St.
Torrington, WY 82240 (307) 532-3879

Industrial Development Division - DEPAD
Barrett Bldg.
Cheyenne, WY 82002 (307) 777-7284

Sources — State of Wyoming, Departments of: Revenue and Taxation, Administration and Fiscal Control, Division of Research and Statistics, Employment Security Commission, State Examiner, Wyoming Taxpayers Association, Chambers of Commerce.

Intervening Defendant's Exhibit QQ

1980 COMMUNITY PROFILE - LUSK, WYOMING

Elevation 5,015 Feet

Population

	City	County
1970	1,800	2,924
1975	1,628	2,895
1979 (est.)	1,753	3,101

Recreation

2 city parks with tennis courts and baseball fields. City golf course. Swimming, fishing, hunting, snowmobiling, horseback riding, rodeo.

Geographical

Lusk is the county seat of Niobrara County, located on the eastern border of the state. The county covers a total of 1,663,516 acres and 2,599 square miles.

Climate

Mean daily maximum temperature in:
January 37° July 84°
Mean monthly temperature in:
January 22.8° July 70°
Mean annual precipitation: 15 inches
Mean annual snowfall: 47.8 inches
Average annual wind velocity: 9 mph
Average annual relative humidity: 50%
Average growing season: 137 days

Resources

Minerals: Oil and gas
Forest Land: 17,399 acres
Agriculture: Hay, wheat, oats, barley, cattle and sheep

Municipal Data

Government: Mayor - Council System
Police Force: 6
Sheriff's Office: 2
Fire Department: 24 man volunteer unit
Insurance Rating: 8
City Limits: 640 acres
Zoning: Act Administered by Planning Commission
Streets: 75% paved; 25% have sidewalks and gutters

Housing

	County
Single Family Units	1,050
Multi-Family Units	20
Mobile Homes	87

Estimated cost of a new 3-bedroom home, 1,100 sq. ft., unfinished basement, 1-car garage: $45,000

Average monthly rental, 3-bedroom home: $250

Average monthly rental, 1-3 bedroom apt.: $150

Church

Protestant - 7, Catholic - 1, LDS - 1

Education

	Schools	Pupils
High School	1	214
Jr. High School	1	126
Elementary Schools	1	234

Total Expended Per Pupil: $1,739
Ratio of Pupils/Teachers: 15:9
Eastern Wyoming Community College in Torrington (57 miles) 740
Libraries: 1 Volumes: 23,000

Medical

Doctors: 2 Dentists: 1
Niobrara Memorial Hospital, 12 beds
Nursing Home, 36 beds

Media

Newspaper: Lusk Herald, weekly circulation, 3,000
Radio: No local stations. All channels available
Television: No local station. All channels available with Cable

Accommodations

Motels: 6 Rooms: 160
Convention Facilities: 2 Room Capacities: 125, 250

Business

Number of Retail Establishments - County: 60
Number of Wholesale Establishments - County: 8
Net Collection of Retail Sales Tax - County: $295,024.35
Banks: 2 Total Deposits: $24,739,000

Tax Structure

Wyoming has no state, personal or corporate income tax.

Assessed Valuation—
City: $3,275,082
County: $25,479,644

Property Taxes Levied—
City: $215,750
County: $1,566,090

Tax Levy (Mills)—
City: 65.876
County: 20.876

Bonded Indebtedness—
City: $220,000

Sales Tax Rate: 4%

Sales Tax Collected—
County: $550,056.42

Sales Tax Distributed Back to—
City: $138,585.90
County: $121,971.14

1979 minerals assessed valuation subject to severance and ad valorem taxes based on 1978 production is: $9,515,764.

Ratio of assessed valuation to true value for 1979 is approximately 8-10%.

Transportation

Highways:
US 85, 18 and 20
Railroads:
Chicago & Northwestern
Motor Freight Carriers:
Briggs Transportation
Ross Transfer
Salt Creek Freightways
Transcon Lines
Air Service:
Lusk Airport, 4,734 feet of asphalt
Charter & Commercial Services available in Casper (104 miles)
Bus Service:
Trailways, Inc.

Utilities

Municipal Water Source:
Wells - 5
Source capacity: 2.2 million gal/day
Peak demand: 2.2 million gal/day
Storage capacity: 440,000 gallons
New wells presently being drilled
Treatment: None required
Rates: 10,000 gal. - $2.50 and $.15/1,000 gal. thereafter

Sewage System—

Sewage treatment: Aeration disposal system. Plans presently underway to expand sewage system

Rates:

Residential - $.75/mo.

Commercial - $1.00 min. or ¼ of monthly water charge

Refuse Disposal—

Method: Sanitary landfill

Charge: $1.50/mo. (residential); Commercial varies

Natural Gas—

Supplier: Kansas-Nebraska Natural Gas Company, Inc.

*General Rates

cu. ft./mo.	per Mcf
First 1,000	$2.05
Next 4,000	1.15
Next 45,000	.90
Next 50,000	.75
Over 100,000	.70

Electric Power—

Supplier: Town of Lusk

*Rates - General

kwh per mo.	per kwh
First 50	10¢
Next 50	9¢
Next 200	3.5¢
Next 700	2.3¢
Over 1,000	2.0¢

*Other rate schedules are available.

Labor Market Analysis

1978 Per Capita Income - County: $9,385
(source: BEA, Regional Economic Information System)

County Labor Force -

1979 Annual Average: 1,324

Male: 866 Female: 458

Unemployment - 1979 Annual Average: 33

Male: 14 Female: 19

Unemployment Rate: 2.5%

Distribution of Labor Force-3rd Quarter 1979: Covered Employment

	No. Firms	No. Emp.
Mining	7	39
Construction	11	39
Manufacturing	5	42
Trans., Comm., & Utilities	7	31
Wholesale Trade	7	39
Retail Trade	27	180
Finance, Ins., Real Estate	7	32
Services with Agriculture, Forestry and Fisheries	26	201

Average Weekly Wage Rates:

	County	State
Mining	$280.10	$427.09
Construction	279.92	336.04
Manufacturing	160.73	292.18
Trans., Comm., & Utilities	321.67	334.91
Wholesale Trade	115.24	300.89
Retail Trade	139.14	147.92
Finance, Ins., Real Estate	152.99	227.15
Services with Agriculture, Forestry and Fisheries	148.98	178.88
Average of All Categories	199.85	280.63

Major Industries

Agriculture, Refinery

Major Employers

	Product	Emp.
C & H Refinery	Gas	9
Ranchers Feed Products	Animal Feed	11
Vollmer Machine Shop	Mfg. Leaf Springs	12
Don's Fireplace & Furnace Factory	Stoves	6

Available Industrial Properties

City owned—165 acres adjacent to rail facilities and highway access. Fire protection by city.

City owned—80 acres, rail and highway access, fire protection by city.

Cultural Attractions

Niobrara County Fair
Stagecoach Museum
Limestone Fossil Beds
Lusk Opery House Melodrama

Further Information

Niobrara County Chamber of Commerce
Box 125
Lusk, WY 82251 (307) 334-2398

Industrial Development Division - DEPAD
Barrett Bldg.
Cheyenne, WY 82002 (307) 777-7284

Sources -- State of Wyoming, Departments of: Revenue and Taxation, Administration and Fiscal Control, Division of Research and Statistics, Employment Security Commission, State Examiner, Wyoming Taxpayers Association, Chambers of Commerce.

HISTORICAL ENCYCLOPEDIA OF WYOMING

NIOBRARA COUNTY HISTORY

By Mae Urbanek

Three flags have flown over the land that is now Niobrara County —those of Spain, France, and the United States. It has been part of six territories—Louisiana, Missouri, Nebraska, Idaho, Dakota, and Wyoming; and of two other counties—Laramie and Converse, from which it was split in 1911. The "east-enders" objected to the long trip to Douglas, county seat of Converse County. Harry C. Snyder and E. B. Willson led the action to divide the county. Mr. Snyder suggested the name Niobrara. Lusk was chosen county seat at a special election. Governor Carey appointed E. B. Willson, Albert Rochelle, and Thomas H. Thompson as the first county commissioners.

Although most of Niobrara County is treeless prairie, a ridge of pine and cedar-covered hills known as the "Breaks" runs from east to west through the south central part. These Breaks make a climatic division. To the south deep snows fall and rich grasses grow in the sandy soil. This is one of the best dry farming areas in Wyoming and grows heavy crops of summer-fallowed wheat. North of the Breaks the land, a thousand feet lower in altitude, is gumbo type and receives less moisture. Winters are usually open, allowing grazing of short, nutritious grasses. Average rainfall of the county is 15.13 inches. It contains 2613 square miles, with an estimated population in 1966 of 3720. Assessed valuaton in 1965 was $15,592,508 and the major source of income was agriculture.

Like most of Wyoming, Niobrara County was an ocean millions of years ago. As the Rocky Mountains rose, part of the water drained away, leaving tropical marshes with dense vegetation. Huge dinosaurs feasted and fought where sheep and cattle now graze. Again and again the buckling earth heaved up the land. Prehistoric animals trapped in mud and covered with volcanic ashes were preserved as fossils. Northern Niobrara County is a treasure chest of petrified skeletons of dinosaurs, dawn-horses, small camels, rhinoceroses, saber-toothed tigers, and oreodons. There in 1907 George Sternberg, a noted fossil hunter, found the world's oldest mummy, a duck-billed dinosaur with shrunken skin, well-preserved, the only dinosaur skin ever found. The specimen is now in the American Museum of Natural History in New York. Recently, on a tributary of the Cheyenne River, Lou Bass, of Lusk, found a bone from a Triceratops dinosaur, a three-horned monster of the Mesozoic age. Some of these Niobrara fossils are in the museum

at the University of Wyoming; some at the School of Mines in Rapid City, South Dakota; but most of them are in eastern museums.

Probably the first organized industry in Wyoming took place in Niobrara County about ten thousand years ago at what are now known as Spanish Diggings. These prehistoric quarries or pits, dug thirty feet deep into solid rock with only stone tools, were misnamed by early cowboys who thought Spanish adventurers had dug there for gold. But Spaniards never came as far north as Wyoming. Smithsonian Institution scientists investigating the Diggings judged their age by lichen growths on discarded rocks. Crude digging and hunting tools were chipped from the lavender and golden quartzite dug from the pits. Tepee rings and chipping sites also spread into Goshen and Platte Counties.

Indians named the river that rises as a stream west of Lusk. The name was first written in a government treaty with Pawnee Indians in 1853. "Ni" was their name for water; "obthatha" for spreading; which became in white men's language, Niobrara. In early days the Niobrara River was also called Running Water.

Lusk has long been at the crossroads of transcontinental trails. Gold was discovered in the Black Hills of South Dakota in 1874. Indians fought the invasion of gold-crazed prospectors flooding into the land promised to the Indians "as long as grass shall grow and water flow" in the Fort Laramie Treaty of 1868. Captain Egan was sent with troops from Fort Laramie in 1875 to build a fort on Hat Creek in Nebraska. Wandering in the unmarked wilderness, they built their log fort on Sage Creek in Wyoming, naming it Fort Hat Creek. A tunnel connected the fort to Sage Creek, so water could be obtained in time of siege. This fort is about twelve miles northeast of Lusk. In the early eighties John Storrie and Tom Swan erected a large two-story log building where the old fort was. This building is still standing.

Luke Voorhees, an experienced frontiersman, was superintendent of the new Cheyenne and Black Hills Mail and Express Company in 1876. He located stations for changing horses about every eighteen miles. The trail ran west of Rawhide Buttes. The stone barn on Running Water, near present-day Lusk, was one of the stations. From Fort Hat Creek the route led north across Cheyenne River near the famous holdup spot, Robbers Roost. When road agents and Indians made this long stretch north of Hat Creek especially perilous, the route was shifted east through Indian Creek country. When Russell Thorp, Senior, bought the stage line in 1883, he made the Rawhide Station, now the Ord Ranch, his headquarters. Hat Creek, at the end of the telegraph line, became a well-

developed station with stores, blacksmith shop, and even a brewery.

Traffic to the gold mines of Deadwood was heavy: prospectors, gamblers, promoters, highjackers, and adventurers. Of these Calamity Jane and Wild Bill Hickok were the most famous. Gold bricks were transported to the Cheyenne railroad in steel salamanders bolted to bullet-proof coaches. Guards rode shotgun on the boot of coaches drawn by fast tandem teams of six horses. Long string teams of oxen were used to freight goods over rutted roads. These ruts may still be seen in the butte rock north of Lusk. George Lathrop and Fred Sullivan were drivers of the stagecoaches. Lathrop had the honor of "holding the ribbons" when the stage made its last trip in 1887. One of the stagecoaches is now in the Lusk Museum. George Lathrop is buried two miles west of Lusk, where a monument marks his grave.

Off to the west of the road running south of Lusk are the few remains of what was a tavern. It was nothing more than a dugout affair which was operated in the late 70s by a character known as Mother Featherlegs. The late Dr. Walter Reckling wrote before his death: " 'Mom Featherlegs' was quite the old biddy, if one is to believe the history in Agnes Wright Spring's book, 'Cheyenne and Black Hills Stagecoach Routes,' put out by the Arthur Clark Company of Glendale, California, in 1949. Russell Thorpe, Jr., tells me (Dr. Reckling) that he gave Mrs. Spring the information on Mom Featherlegs. Russell's father was one of the operators of the famous stagecoach line which operated until better means of transportation was found. Russell, Jr., spent time in the summer at his father's ranch which is the present Ord Ranch. As a child with lots of native curiosity, he and a playmate dug into Mom's grave to flee in terror when the first object to appear in the opened casket was her flaming red hair.

"Mrs. Spring tells how Mom was a mother to a couple of famous southern outlaws who flourished following the Civil War. These sons were caught and hanged by the authorities. Mom lost her life by means of a bullet." A state monument now marks her grave.

Following the Civil War there were too many cattle in Texas. Cowboys moved huge herds of longhorns north from Texas to railroad centers and to pastures along the Texas Trail, which crossed the Cheyenne-Deadwood route at the present location of Lusk. John B. Kendrick, later U.S. Senator from Wyoming, drove cattle to Montana up this trail in 1879. He said he traveled more than four hundred miles between Fort Worth, Texas, and Silver Cliff, now Lusk, without seeing a barbed wire fence. A Texas Trail monu-

ment is a few miles east of Lusk. Now U.S. Highway 85, running from Canada to Mexic.., and 20, an east-west artery of travel, cross on the main street of Lusk.

In 1880 a prospector named McHenry passed through and liked the looks of a large hill where Lusk now stands. Outfitted with supplies and two helpers he started work on the hill, named Silver Cliff. Miners living in tents worked the hill for four years, taking out considerable ore—copper, silver, and gold. A New York company financed the mine. When their checks to the miners proved worthless, the enterprise folded up. In 1918 the first uranium in Wyoming was detected in the abandoned shafts of the old Silver Cliff hill. It was not in sufficient quantity to develop.

Three-hundred-mile trips to Cheyenne and back for beans, salt pork, and other necessities of like ended on July 13, 1886, when the Fremont, Elkhorn and Missouri Valley Railroad, now the Northwestern, arrived. Officials offered to buy the land where Silver Cliff stood from Ellis Johnson, but his price was too high. Frank Lusk donated the land to the east, and railroad officials laid out the townsite of Lusk, named in his honor. The present old Free Lance building and tents were quickly moved from Silver Cliff to Lusk. Residents greeted the railroad with a big celebration and driving of a spike made from local silver and copper. The mines in Muskrat Canyon to the south of Lusk furnished the copper.

Other Niobrara towns were spawned by the coming of the railroad. To the east of Lusk, Van Tassell was named by railroad officials for Schuyler Van Tassell, a pioneer rancher with large holdings. There on June 28, 1919, was organized one of the first four American Legion Posts in the United States: Ferdinand Branstetter Post No. 1, named for a resident of Van Tassell who was one of the first to die on the battlefields of France. Manville, ten miles west of Lusk, was named for H. S. Manville, organizer of Converse Cattle Company in 1880. Keeline was named for George A. Keeline, owner of 4 J Ranch.

The last killing in the Johnson County War took place north of Keeline in the fall of 1893. Charlie Hitshew was cleaning a meadow on the Horseshoe Ranch when he heard a shot and saw a riderless horse running in circles. He caught the horse and found its rider, a young man, dead. Meanwhile the killer, Mike Shonsey, went to Lum Barber, the Lusk sheriff, and gave himself up, claiming that Dudley Champion, brother of Nate Champion, had drawn first and that he shot in self-defense. Released by the sheriff and a hastily called court, Shonsey lost no time in fleeing to Mexico.

It was supposed that Shonsey had feared the brother of the murdered Nate Champion, and waylaid and shot him.

The last armed engagement between Sioux Indians and white men took place in Niobrara County on Lightning Creek in the fall of 1903. A group of Indians had been given permission to leave the Pine Ridge Reservation in South Dakota to go on their annual hunt. Controversy arose between ranchers who claimed Indians were killing cattle and the Indians who said they were only hunting antelope and deer. Led by Sheriff Miller of Newcastle, ranchers attacked the entrenched Indians at Lightning Creek. Sheriff Miller and men on both sides were killed in a bloody battle. The Indians fled back to the reservation. Some squaws were wounded. At a hearing in Douglas no action was brought against the Indians, the feeling being that they had been unlawfully attacked.

In 1907 Reverend George Dalzell conceived the idea of a preparatory college sponsored by the Christian Church of Ohio on his homestead between Manville and Keeline. In the spring of 1908 many educated pilgrims staked out their homesteads near his, and plotted the town of Jireh, "The Lord will provide." There in the fall of 1910 in a large frame building opened Jireh College, the first junior college in Wyoming. Appropriations for an experiment farm in connection with the college were passed by the state legislature in 1911. In its peak year the college had sixty-five students. Years of drought set in and homesteaders moved away; high schools were started in Keeline and Manville, and the college closed in 1920. A historical marker on U.S. Highway 20 is near the site of this first mirage of culture on the sage-sprinkled prairies.

A strong flow of gas from three test wells in Cow Gulch in 1917 heralded the Lance Creek oil boom. The Union Oil Company of California leased twenty thousand acres between Buck Creek and Twenty Mile Creek. A rotary drill, tons of casing, pipe, and machinery were unloaded in Lusk and Manville and hauled by horses and trucks to the new field. Within a year twenty-five rigs were operating. Ohio Oil Company opened as a big producer in 1918. Rigs and camp equipment were rushed to mushrooming Lance Creek. In four days 555 tons of freight were moved from Lusk alone. A refinery was built and pipe line laid to the railroad. A big gusher came in with two thousand barrels of oil in the first few hours. Derricks were everywhere. When shallow wells weakened, drilling deepened. The Lance Creek Field was first in oil production in Wyoming from 1939 to 1945. It is still producing, and wells to the north and east of Lance Creek are being brought in.

For years the highlight of the summer season in Niobrara

County was the presentation in Lusk of the pageant, "Legend of the Rawhide," which more than two hundred rural and urban people dramatized in costume. The legend instigated by Dr. Walter E. Reckling and written by Eva Lou Bonsell was first enacted in 1946. It had many scenes portraying life in an Indian village; life and stuggles of emigrants in a covered wagon train in 1849; the shooting of an Indian maid; an Indian attack on the encamped wagon train; a burning wagon; and the skinning of a man alive by the Indians. The story of the pageant was based on a legend about the naming of the Rawhide Buttes to the south of Lusk. It was presented for the 27th and last time in 1965.

Since the flow of oil in the Lance Creek Field has tapered off, much of the county income is derived from cattle and sheep. Joe Pfister has won national recognition for his Columbia sheep and their fleeces. There is a strong 4-H Extension program, promoted by Lusk businessmen. The Niobrara 4-H livestock judging team, coached by Si West, county agricultural agent, won the national livestock judging championship in 1949. Livestock judging teams from Niobrara County have won seven state championships and six reserve championships. While young people learn by working, they also have good times together at parties and at camp in Mallo Canyon, Weston County.

Politically, Frank A. Barrett, a Lusk lawyer, has been Niobrara's most important citizen. He was elected U.S. Representative from Wyoming in 1942 and re-elected in 1946; was governor of Wyoming, 1951-53; and U.S. Senator from 1954 to 1958. A conscientious worker and efficient administrator, he never let the sun go down on an unanswered letter.

Winners of firsts from the county were Dorothy Evelyn DeGroot, who was Miss Wyoming in 1930; Carol Jean Held, Miss Wyoming in 1950; Mrs. James Berry, Mrs. Wyoming in 1966. Mrs. Berry was runner-up in the national contest and became Mrs. United States Savings Bond, traveling the nation to promote sales of bonds. Niobrara County has a large number of artists. Most exceptional are paintings of Mrs. Mattie Thompson, in her early sixties, self-taught painter with a primitive style similar to Grandma Moses. Elsie Christian, another artist of western landscapes, helped Mrs. Thompson develop her talent. Berniece Bird, also gifted in protraying western scenes in vivid colors, painted her first picture of a dog on sheepwagon canvas when she was eleven.

A recent development in Niobrara County is pump irrigation, utilizing a vast underground water table with automatic sprinkler systems. As early as 1946 N. V. Lamb started irrigating near

Manville. In 1969 more than 33 wells were irrigating approximately 3200 acres on 18 ranches. Sugar beets, alfalfa, beans, potatoes, corn, small grains, and crambe, an industrial crop used in the manufacture of plastics, are being successfully raised, and pastures irrigated. The Natural Resource Board of Wyoming keeps a check on the water level in each well so that the water table is not lowered to a harmful depth.

People of the county are proud of their children, their schools, and their churches. A high school with a large gymnasium and auditorium encourages athletics and productions of difficult dramas and musicals, such as "The Sound of Music." Music is especially stressed. The Lusk High School Band has won many honors. Lusk athletes are state-wide winners in wrestling and basketball. A new Memorial Hospital has been constructed. The large surrounding grounds have been landscaped by local organizations.

Swimming at the newly constructed Lusk pool, golf at the Niobrara Country Club, rock hunting in its Fairburn agate fields, square dancing, and bridge games are some of the recreations available in the county. To quote from Lusk Woman's Club pamphlet: "The relative isolation characteristic of the area has proven to be its strength, for it forces its people into resourcefulness, producing a vigorous, individualistic, yeasty breed of participants rather than spectators."